

# STATE OF COLORADO

John W. Hickenlooper, Governor  
Christopher E. Urbina, MD, MPH  
Executive Director and Chief Medical Officer

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S.      Laboratory Services Division  
Denver, Colorado 80246-1530      8100 Lowry Blvd.  
Phone (303) 692-2000      Denver, Colorado 80230-6928  
Located in Glendale, Colorado      (303) 692-3090

<http://www.cdph.e.state.co.us>



Colorado Department  
of Public Health  
and Environment

November 23, 2011

Roy Heald, General Manager  
Security Sanitation District  
231 Security Blvd.  
Colorado Springs, CO 80911

**RE: Compliance Order on Consent, Number: MC-11115-1**

Dear Mr. Heald:

Enclosed for Security Sanitation District's records you will find your copy, with original signatures, of the recently executed Compliance Order on Consent. Please remember that this agreement is subject to a thirty-day public comment period (paragraph 34). Upon initiation, if the Division receives any comments during this period we will contact your office to discuss. Also, please be advised that the first page of the Order was changed in order to place the assigned Order Number on the final document.

If you have any questions, please don't hesitate to contact Jackie Whelan at (303) 692-3617 or by electronic mail at [jackie.whelan@state.co.us](mailto:jackie.whelan@state.co.us).

Sincerely,

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

*Enclosure(s)*

cc: El Paso County Public Health EH Division  
Tad Foster, 20 Boulder Crescent, Colorado Springs, CO 80903  
Enforcement File

cc: Natasha Davis, EPA Region VIII

Joe Talbott, Engineering Section, CDPHE  
Dave Knope, Engineering Section, CDPHE  
Dick Parachini, Watershed Program, CDPHE  
Gary Beers, Permits Unit, CDPHE  
Barry Cress, DOLA  
Michael Beck, Grants and Loans Unit, CDPHE  
Jackie Whelan, Case Person  
Tania Watson, Compliance Assurance, CDPHE  
Rachel Wilson-Roussel, SEP Coordinator, CDPHE



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

---

**COMPLIANCE ORDER ON CONSENT**

**NUMBER: MC-111115-1**

---

**IN THE MATTER OF: SECURITY SANITATION DISTRICT**  
**CDPS PERMIT NO. CO-0024392**  
**EL PASO COUNTY, COLORADO**

---

The Colorado Department of Public Health and Environment (“Department”), through the Water Quality Control Division (“Division”), issues this Compliance Order on Consent (“Consent Order”), pursuant to the Division’s authority under §§25-8-602 and 605, C.R.S. of the Colorado Water Quality Control Act (“the Act”) §§25-8-101 to 703, C.R.S., and its implementing regulations, with the express consent of Security Sanitation District (“Security SD”). The Division and Security SD may be referred to collectively as “the Parties.”

**STATEMENT OF PURPOSE**

1. The mutual objective of the Parties in entering into this Consent Order is to resolve, without litigation, the civil penalties associated with the alleged violations cited herein and in the Notice of Violation and Cease and Desist Orders (Numbers DO-060629-1 and MO-070928-1) issued to Security SD on June 29, 2006, and September 28, 2007, respectively.

**DIVISION’S FINDINGS OF FACT AND DETERMINATION OF VIOLATIONS**

2. Based upon the Division’s investigation into and review of the compliance issues identified herein, and in accordance with §§25-8-602 and 605, C.R.S., the Division has made the following determinations regarding the Facility and Security SD’s compliance with the Act and its implementing permit regulations and/or permit.
3. At all times relevant to the violations cited herein, Security SD was a “Special District” formed in El Paso County pursuant to the Colorado Special District Act, §§32-1-101 to 32-19-115 C.R.S.
4. Security SD is a “person” as defined under the Water Quality Control Act, §25-8-103(13), C.R.S., and its implementing permit regulation, 5 CCR 1002-61, §61.2(73).

5. Security owns and/or operates a wastewater treatment facility located in the Northeast ¼ of the Northeast ¼ of Section 23 and the Northwest ¼ of the Northwest ¼ of Section 24, Township 15 South, Range 66 West, El Paso County, Colorado (the “Facility”).
6. The Facility is the subject of the Colorado Discharge Permit System, Permit No. CO-0024392 (the “Permit”) which became effective February 1, 2003, and has been administratively continued until a renewal permit is issued.
7. The Permit specifies that the District is authorized to discharge effluent wastewater from the Facility at Outfall 001A into Fountain Creek. The discharge is subject to the specific effluent limitations and other conditions of the Permit.
8. Outfall 001A is a “point source” as defined by §25-8-103(14), C.R.S. and its implementing permit regulation, 5 CCR 1002-61, §61.2 (75).
9. Fountain Creek is “state waters” as defined by §25-8-103(19), C.R.S. and its implementing permit regulation, 5 CCR 1002-61, §61.2 (102).
10. Section 61.8, 5 CCR 1002-61, states in part that, “A permittee must comply with all the terms and conditions of the permit.”

**Failure to Comply with Effluent Limitations**

11. Pursuant to Part I.A.5 of the Permit, among other parameters, the Security SD’s permitted discharge at Outfall 001A shall not exceed the effluent limitations specified below:

Effluent Parameter	Effluent Limitations Maximum Concentrations		
	30-Day Average	7-Day Average	Daily Maximum
Mercury, total (ug/l), through December 31, 2005	0.044	n/a	Report
Mercury, total (ug/l), beginning January 1, 2006	0.011	n/a	Report
Total Ammonia (as N), (mg/l), through October 31, 2007	15	n/a	Report
Total Ammonia (as N), (mg/l), beginning November 1, 2007			
January	Report	n/a	Report
February	9.8	n/a	Report
March	8.6	n/a	12
April	13.3	n/a	Report
May	12	n/a	20
June	14	n/a	Report
July	16	n/a	Report
August	18	n/a	Report

Effluent Parameter	Effluent Limitations Maximum Concentrations		
	30-Day Average	7-Day Average	Daily Maximum
September	22	n/a	Report
October	15.2	n/a	15.2
November	24	n/a	Report
December	26	n/a	Report
Selenium, potentially dissolved (ug/l), through December 31, 2005	Report	N/A	Report
Selenium, potentially dissolved (ug/l), beginning January 1, 2006	5.9	n/a	19.0
WET, LC50 Pimephales	n/a	n/a	LC50 >100%
Oxygen, dissolved (mg/l)	n/a	n/a	>5.0
Fecal Coliform (Number/100 ml)	2206.0	4412.0	n/a

12. Pursuant to Part I.B.1 of the Permit, to provide an indication of compliance or non-compliance with the effluent limitations identified in the Permit, the Security SD is required to sample and monitor defined effluent parameters at Outfall 001A, following chlorination/dechlorination and prior to mixing with Fountain Creek.
13. Pursuant to Part I.D.2 of the Permit, the Security SD is required to summarize and report the analytical results of its effluent monitoring to the Division via monthly discharge monitoring reports (“DMRs”). Each discharge monitoring report is to include a certification by the Security SD that the information provided therein is true, accurate, and complete to the knowledge and belief of the Security SD.
14. The Security SD’s DMRs submitted to the Division include, among other information and data, the following effluent concentration summary data for Total Mercury, Total Ammonia (as N), Selenium, Whole Effluent Toxicity (“WET”), Dissolved Oxygen and Fecal Coliform Bacteria which exceeded the effluent limitations imposed by Part I.A.5 of the permit:

Discharge Monitoring Reporting Period	Outfall Number	Sample Measurement	Sample Measurement
<b>Mercury, total (ug/l)*</b>			<b>30-Day Average Limit = 0.011 ug/L</b>
January 1-January 31, 2006	001A	--	0.018
March 1-March 31, 2006	001A	--	0.018
April 1-April 30, 2006	001A	--	0.016
June 1-June 30, 2006	001A	--	0.019
July 1-July 31, 2006	001A	--	0.019

<b>Discharge Monitoring Reporting Period</b>	<b>Outfall Number</b>	<b>Sample Measurement</b>	<b>Sample Measurement</b>
August 1-August 31, 2006	001A	--	0.051
September 1-September 30, 2006	001A	--	0.026
October 1-October 31, 2006	001A	--	0.023
January 1-January 31, 2007	001A	--	0.016
February 1-February 28, 2007	001A	--	0.014
March 1-March 31, 2007	001A	--	0.012
June 1-June 30, 2007	001A	--	0.018
December 1-December 31, 2007	001A	--	0.012
July 1-July 31, 2009	001A	--	0.012
July 1-July 31, 2010	001A	--	0.014
<b>Total Ammonia (as N), (mg/L)</b>		<b>Daily Maximum</b>	<b>30-Day Average</b>
February 1-February 28, 2008 (30-Day Average Limit = 9.8 mg/L)	001A	--	13.9
March 1-March 31, 2008 (Daily Maximum Limit = 12.0 mg/L) (30-Day Average Limit = 8.6 mg/L)	001A	13.6	10.2
February 1-February 28, 2009 (30-Day Average Limit = 9.8 mg/L)	001A	--	13.5
March 1-March 31, 2009 (Daily Maximum Limit = 12.0 mg/L) (30-Day Average Limit = 8.6 mg/L)	001A	14.1	11.7
March 1-March 31, 2010 (Daily Maximum Limit = 12.0 mg/L) (30-Day Average Limit = 8.6 mg/L)	001A	--	9.8
April 1-April 30, 2010 (30-Day Average Limit = 13.3 mg/L)	001A	--	14.5
February 1-February 28, 2011 (30-Day Average Limit = 9.8 mg/L)	001A	--	11.5
<b>Selenium, potentially dissolved (µg/L)</b>		<b>Daily Maximum</b>	<b>30-Day Average Limit = 5.9 µg/L</b>
July 1-July 31, 2007	001A	--	7.3
<b>WET, LC50 Pimephales</b>		<b>Daily Maximum = LC50 &gt;100%</b>	
1Q08 (2/20/08)	001A	27%	--
1Q10 (3/29/10)	001A	53%	--
<b>Dissolved Oxygen (mg/L)</b>		<b>Daily Maximum = &gt;5.0 mg/L</b>	

<b>Discharge Monitoring Reporting Period</b>	<b>Outfall Number</b>	<b>Sample Measurement</b>	<b>Sample Measurement</b>
August 1-August 31, 2008	001A	4.2	
November 1-November 30, 2010	001A	3.9	
<b>Fecal Coliform Bacteria (Number/100 mL)</b>			<b>7-Day Average Limit = 4412.0/100 mL</b>
January 1-January 31, 2009	001A	--	4,454

\* Reported results have been rounded to coincide with the number of significant figures associated with the Permit limit.

15. Total Mercury, Total Ammonia (as N), Selenium, Whole Effluent Toxicity (“WET”), Dissolved Oxygen and Fecal Coliform Bacteria are each a “pollutant” (or indicator thereof) as defined by §25-8-103(15), C.R.S. and its implementing permit regulation, 5 CCR 1002-61, §61.2 (76).
16. Division records establish that the Permit did not authorize the pollutant discharge levels identified above in paragraph 14 and the Security SD’s does not have any other permits authorizing such discharge into State Waters.
17. Security SD’s failure to comply with the effluent limitations set forth in the Permit and identified above in paragraph 14 constitutes violations of Part I.A.5 of the Permit.
18. The Division acknowledges that the Security SD’s timely and satisfactorily performed all of the obligations and actions required under the *June 29, 2006*, and the *February 26, 2007*, Notice of Violation / Cease and Desist Orders.

### **ORDER AND AGREEMENT**

19. Based on the foregoing factual and legal determinations, pursuant to its authority under §§25-8-602 and 605, C.R.S., and in satisfaction of the civil penalties associated with the alleged violations cited herein and in the Notice of Violation and Cease and Desist Orders (Numbers DO-060629-1 and MO-070928-1), the Division orders Security SD to comply with all provisions of this Consent Order, including all requirements set forth below.
20. Security SD agrees to the terms and conditions of this Consent Order. Security SD agrees that this Consent Order constitutes a notice of alleged violation and an order issued pursuant to §§25-8-602 and 605, C.R.S., and is an enforceable requirement of the Act. Security SD also agrees not to challenge directly or collaterally, in any judicial or administrative proceeding brought by the Division or by Security SD against the Division:
  - a. The issuance of this Consent Order;
  - b. The factual and legal determinations made by the Division herein; and
  - c. The Division’s authority to bring, or the court’s jurisdiction to hear, any action to enforce the terms of this Consent Order under the Act.
21. Notwithstanding the above, Security SD does not admit to any of the factual or legal determinations

made by the Division herein, and any action undertaken by Security SD pursuant to this Consent Order shall not constitute evidence of fault and liability by Security SD with respect to the conditions of the Facility.

### **COMPLIANCE REQUIREMENTS**

22. Security SD shall immediately implement measures to maintain compliance with the Colorado Water Quality Control Act and the terms and conditions of its CDPS Permit.

### **SUPPLEMENTAL ENVIRONMENTAL PROJECTS**

23. Based upon the application of the Division’s Civil Penalty Policy (May 1, 1993), and consistent with Departmental policies for violations of the Act, the Division has determined that a penalty of Forty-Three Thousand Six Hundred Fifty-Seven Dollars (\$43,657.00) is appropriate for the violations cited herein and in the June 29, 2006 and the February 26, 2007, Notice of Violation / Cease and Desist Orders.
24. Through the application of the criteria set forth in the Colorado Department of Public Health and Environment’s Final Agency-Wide Policy on Settling Administrative and/or Civil Penalties Against Eligible Governmental Entities, the Division has determined that the entire penalty can be mitigated through the completion of a Supplemental Environmental Project (“SEP”), which is valued at not less than Forty-Three Thousand Six Hundred Fifty-Seven Dollars (\$43,657.00).
25. Security SD shall undertake the following SEP, which the Parties agree is intended to secure significant environmental or public health protection and improvements:
  - a. Security SD shall donate Forty-Three Thousand Six Hundred Fifty-Seven Dollars (\$43,657.00) to the City of Fountain’s Electric Department. The funds will be used for the replacement of existing high pressure sodium or mercury vapor streetlights with high efficiency LED lights as further described in Exhibit A.
  - b. Security SD shall make the payment of Forty-Three Thousand Six Hundred Fifty-Seven Dollars (\$43,657.00) to the City of Fountain Electric Department, to the attention of M. Thomas Black, Planning and Engineering Manager, 6745 Southmoor Drive, Fountain Colorado 80817. Security SD shall provide the Division with a copy of the cover letter and check within thirty (30) calendar days of the effective date of this Consent Order.
26. Security SD shall not deduct the expenses associated with the implementation of the above-described SEP for any tax purpose or otherwise obtain any favorable tax treatment of such payment or project.
27. Security SD hereby certifies that, as of the date of this Consent Order, it is not under any existing legal obligation to perform or develop the SEP. Security SD further certifies that it has not received, and will not receive, credit in any other enforcement action for the SEP. In the event that Security SD has, or will receive credit under any other legal obligation for the SEP, Security SD shall pay Forty-Three Thousand Six Hundred Fifty-Seven Dollars (\$43,657.00) to the Division as a civil penalty within thirty (30) calendar days of receipt of a demand for payment by the Division. Method

of payment shall be by certified or cashier's check drawn to the order of the "Colorado Department of Public Health and Environment," and delivered to:

Mr. Scott Klarich  
Colorado Department of Public Health and Environment  
Water Quality Control Division  
Mail Code: WQCD-CAS-Enforcement  
Cherry Creek Drive South  
Denver, Colorado 80246-1530

28. All SEPs must be completed to the satisfaction of the Division, within one year of the effective date of this Consent Order and must be operated for the useful life of the SEP. In the event that Security SD fails to comply with any of the terms or provisions of this Consent Order relating to the performance of the SEP, Security SD shall be liable for penalties as follows:
  - a. Payment of a penalty in the amount of Forty-Three Thousand Six Hundred Fifty-Seven Dollars (\$43,657.00). The Division, in its sole discretion, may elect to reduce this penalty for environmental benefits created by the partial performance of the SEP.
  - b. Security SD shall pay this penalty within thirty (30) calendar days of receipt of written demand by the Division. Method of payment shall be as specified in paragraph 27 above.
29. Security SD shall submit a SEP Completion Report to the Division within one year of the effective date of this Consent Order. The SEP Completion Report shall contain the following information:
  - a. A detailed description of the SEP as implemented;
  - b. A description of any operating problems encountered and the solutions thereto;
  - c. Itemized costs, documented by copies of purchase orders and receipts or canceled checks or other forms of proof of payment;
  - d. Certification that the SEP has been fully implemented pursuant to the provisions of this Consent Order; and
  - e. A description of the environmental and public health benefits resulting from implementation of the SEP (*with quantification of the benefits and pollutant reductions, if feasible*).
30. Failure to submit the SEP Completion Report with the required information, or any periodic report, shall be deemed a violation of this Consent Order.
31. Security SD shall include the following language in any public statement, oral or written, making reference to the SEP: "This project was undertaken in connection with the settlement of an enforcement action taken by the Colorado Department of Public Health and Environment for violations of the Colorado Water Quality Control Act."
32. Security SD shall submit quarterly SEP progress reports to the Division outlining efforts undertaken to complete the SEP. The first report shall be submitted to the Division on or before March 31, 2012. At a minimum, each report shall outline the SEP activities undertaken in the current reporting period and planned activities for the next quarter to remain in compliance with this Consent Order.

## **SCOPE AND EFFECT OF CONSENT ORDER**

33. The Parties agree and acknowledge that this Consent Order constitutes a full and final settlement of the civil penalties associated with the violations alleged herein and in the June 29, 2006 and the February 26, 2007, Notice of Violation / Cease and Desist Orders.
34. This Consent Order is subject to the Division's "Public Notification of Administrative Enforcement Actions Policy," which includes a thirty-day public comment period. The Division and the Security SD each reserve the right to withdraw consent to this Consent Order if comments received during the thirty-day period result in any proposed modification to the Consent Order.
35. This Consent Order constitutes a final agency order or action upon a determination by the Division following the public comment period. Any violation of the provisions of this Consent Order by Security SD, including any false certifications, shall be a violation of a final order or action of the Division for the purpose of §25-8-608, C.R.S., and may result in the assessment of civil penalties of up to ten thousand dollars per day for each day during which such violation occurs.
36. Notwithstanding paragraph 21 above, the violations described in this Consent Order will constitute part of the Security SD's compliance history for purposes where such history is relevant. This includes considering the violations described above in assessing a penalty for any subsequent violations against the Security SD. The Security SD agrees not to challenge the use of the cited violations for any such purpose.
37. This Consent Order does not relieve the Security SD from complying with all applicable Federal, State, and/or local laws in fulfillment of its obligations hereunder and shall obtain all necessary approvals and/or permits to conduct the activities required by this Consent Order. The Division makes no representation with respect to approvals and/or permits required by Federal, State, or local laws other than those specifically referred to herein.

## **LIMITATIONS, RELEASES AND RESERVATION OF RIGHTS AND LIABILITY**

38. Upon the effective date of this Consent Order, and during its term, this Consent Order shall stand in lieu of any other enforcement action by the Division with respect to the civil penalties for the specific instances of violations cited herein and in the June 29, 2006, and the February 26, 2007, Notice of Violation / Cease and Desist Orders. The Division reserves the right to bring any action to enforce this Consent Order, including actions for penalties or the collection thereof, and/or injunctive relief.
39. This Consent Order does not grant any release of liability for any violations not specifically cited herein.
40. Nothing in this Consent Order shall preclude the Division from imposing additional requirements in the event that new information is discovered that indicates such requirements are necessary to protect human health or the environment.
41. Upon the effective date of this Consent Order, Security SD releases and covenants not to sue the State of Colorado or its employees, agents or representatives as to all common law or statutory

claims or counterclaims arising from, or relating to, the violations of the Act specifically addressed herein.

42. Security SD shall not seek to hold the State of Colorado or its employees, agents or representatives liable for any injuries or damages to persons or property resulting from acts or omissions of Security SD, or those acting for or on behalf of Security SD, including its officers, employees, agents, successors, representatives, contractors, consultants or attorneys in carrying out activities pursuant to this Consent Order. Security SD shall not hold out the State of Colorado or its employees, agents or representatives as a party to any contract entered into by Security SD in carrying out activities pursuant to this Consent Order. Nothing in this Consent Order shall constitute an express or implied waiver of immunity otherwise applicable to the State of Colorado, its employees, agents, or representatives.

### **NOTICES**

43. Unless otherwise specified, any report, notice or other communication required under the Consent Order shall be sent to:

For the Division:

Colorado Department of Public Health and Environment  
Water Quality Control Division / WQCD-CAS  
Attention: Scott Klarich  
4300 Cherry Creek Drive South  
Denver, Colorado 80246-1530

Telephone: 303-692-3564  
E-mail: [scott.klarich@state.co.us](mailto:scott.klarich@state.co.us)

For Security SD:

Roy Heald  
General Manager  
Security Sanitation District  
231 Security Blvd.  
Colorado Springs, CO 80911

### **MODIFICATIONS**

44. This Consent Order may be modified only upon mutual written agreement of the Parties.

### **COMPLETION OF REQUIRED ACTIONS**

45. Security SD shall submit a Notice of Completion to the Division upon satisfactory completion of all requirements of this Consent Order. The Division shall either accept or reject Security SD's Notice of Completion in writing within thirty (30) calendar days of receipt. If the Division rejects Security

SD's 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. Security SD shall, within fifteen (15) calendar days of receipt of the Division's rejection, either:

- a. Submit a notice of acceptance of the determination; or
- b. Submit a notice of dispute.

If Security SD fails to submit either of the above notices within the specified time, it will be deemed to have accepted the Division's determination.

46. If the Security SD files any notice of dispute pursuant to paragraph 45 the notice shall specify the particular matters in the Division's determination that the Security SD seeks to dispute, and the basis for the dispute. Matters not identified in the notice of dispute shall be deemed accepted by the Security SD. The Division and the Security SD shall have thirty (30) calendar days from the receipt by the Division of the notification of dispute to reach an agreement. If agreement cannot be reached on all issues within this thirty (30) calendar day period, the Division shall confirm or modify its decision within an additional fourteen (14) calendar days, and the confirmed or modified decision shall be deemed effective and subject to appeal in accordance with the Act and the Colorado State Administrative Procedures Act, §§ 24-4-101 through 108, C.R.S.

#### **NOTICE OF EFFECTIVE DATE**

47. This Consent Order shall be fully effective, enforceable, and constitute a final agency action upon notice from the Division following closure of the public comment period referenced in paragraph 34.

#### **BINDING EFFECT AND AUTHORIZATION TO SIGN**

48. This Consent Order is binding upon the Security SD and its officers, directors, employees, successors in interest, and assigns. The undersigned warrant that they are authorized to legally bind their respective principals to this Consent Order. The Security SD agrees to provide a copy of this Consent Order to any contractors and other agents performing work pursuant to this Consent Order and require such agents to comply with the requirements of this Consent Order. In the event that a party does not sign this Consent Order within thirty (30) calendar days of the other party's signature, this Consent Order becomes null and void. This Consent Order may be executed in multiple counterparts, each of which shall be deemed an original, but all of which shall constitute one and the same Consent Order.

**FOR SECURITY SANITATION DISTRICT:**

*Roy E. Heald*

Date: *November 10, 2011*

Roy E. Heald, General Manager  
Security Sanitation District  
Colorado Springs, CO 80911

**FOR THE COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT:**

*Lori M. Gerzina*

Date: *11/15/11*

Lori M. Gerzina, Manager  
Compliance Assurance Section  
WATER QUALITY CONTROL DIVISION

**Exhibit A**

**SUPPLEMENTAL ENVIRONMENTAL PROJECTS (SEP)  
PROPOSAL/AGREEMENT**

The regulated entity, identified below, submits the following SEP application to the Colorado Department of Public Health and Environment (the department) for SEP consideration.

<b>Enforcement Action Information</b>	Security Sanitation District Case No.: DO-060629-1 and MO-070928-1
<b>Regulated Entity Contact Information</b>	Roy E. Heald, General Manager Security Sanitation District 231 Security Blvd. Colorado Springs, CO 80911 719-392-3475 r.heald@securitywsd.com
<b>3<sup>rd</sup> Party SEP Recipient Contact</b>	M. Thomas Black, Planning and Engineering Manager City of Fountain, Electric 6745 Southmoor Dr Fountain, Colorado 80817 719 322-2082 tblack@fountaincolorado.org
<b>CDPHE Contact Person</b>	Scott Klarich Enforcement Unit Manager
<b>Geographical Area to Benefit Most Directly From Project</b>	City of Fountain Electric Service Territory
<b>Project Title</b>	LED Streetlight Project
<b>Project Type</b>	Third Party SEP Donation
<b>SEP Category</b>	Pollution Reduction and Public Safety
<b>Project Summary</b>	This project would replace existing high pressure sodium or mercury vapor streetlights with high efficiency LED lights. Energy consumption would be reduced by over 50 percent, the driving public would have improved lighting and hazard exposure to lighting maintenance crews would be reduced because of the longer LED lamp life.

**Exhibit A**

<p><b>Project Description</b></p>	<p>This project would replace 36 high pressure sodium (HPS) or mercury vapor cobra style lights with LED lamps using less than one half of the energy for an equivalent light output. The intent is to replace existing 175 watt mercury vapor or 400 watt HPS heads with LED heads that have a comparable light output.</p> <p>The objective is to reduce energy consumption by over 50% which would reduce the carbon footprint relative to lights presently in use. Existing lamps have a design life of 40,000 hours while LED lamps are anticipated to last 100,000 hours. This increase in lamp life reduces truck rolls for replacement and lowers maintenance crew exposure to vehicle hazards while working in the roadway.</p> <p>Implementation would consist of design, permitting, materials ordering and installation. Roadway selection would include major arterials, state highway or a combination of both.</p>																							
<p><b>Expected Environmental and/or Public Health Benefits</b></p>	<p>This project would reduce energy consumption by over 33,000 kWh per year. This represents an annual reduction of 20 to 40 tons of CO2 depending on generation mix. Truck rolls and associated CO2 production will be reduced by more than 50% based on the expected life extension noted above.</p> <p>Existing high pressure sodium lamp heads removed from the system will be reused if possible and mercury vapor lamps will be disposed of using federal guidelines.</p>																							
<p><b>Project Budget</b></p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%; text-align: left;">Budget Category</th> <th style="width: 50%; text-align: left;">Description</th> <th style="width: 20%; text-align: right;">Cost</th> </tr> </thead> <tbody> <tr> <td>Personnel (Salaries, Wages)</td> <td>2 lineman, barricading, supervision, reporting</td> <td style="text-align: right;">3,757</td> </tr> <tr> <td>Materials and Supplies</td> <td>36 – LED cobra head fixtures</td> <td style="text-align: right;">36,000</td> </tr> <tr> <td>Major Equipment</td> <td>Bucket Truck, material truck</td> <td style="text-align: right;">2,100</td> </tr> <tr> <td>Contractors/ Subcontractors</td> <td></td> <td></td> </tr> <tr> <td>Other Direct Costs</td> <td>Minor materials used and disposal of Lamps</td> <td style="text-align: right;">1,800</td> </tr> <tr> <td colspan="2" style="text-align: right;"><b>Total:</b></td> <td style="text-align: right;"><b>\$43,657</b></td> </tr> </tbody> </table>			Budget Category	Description	Cost	Personnel (Salaries, Wages)	2 lineman, barricading, supervision, reporting	3,757	Materials and Supplies	36 – LED cobra head fixtures	36,000	Major Equipment	Bucket Truck, material truck	2,100	Contractors/ Subcontractors			Other Direct Costs	Minor materials used and disposal of Lamps	1,800	<b>Total:</b>		<b>\$43,657</b>
Budget Category	Description	Cost																						
Personnel (Salaries, Wages)	2 lineman, barricading, supervision, reporting	3,757																						
Materials and Supplies	36 – LED cobra head fixtures	36,000																						
Major Equipment	Bucket Truck, material truck	2,100																						
Contractors/ Subcontractors																								
Other Direct Costs	Minor materials used and disposal of Lamps	1,800																						
<b>Total:</b>		<b>\$43,657</b>																						
<p><b>Budget Discussion</b></p>	<p>This project as developed will not be completed without this funding. Replacements will be converted as part of routine capital upgrades without LED lighting.</p>																							

**Exhibit A**

<b>Project Schedule</b>	Proposed Start Date:	January 1, 2012
	Material delivery:	March 31, 2012
	Status Report Due to CDPHE:	March 31, 2012
	Projected Completion Date:	May 15, 2012
	SEP Completion Report Due:	June 15, 2012
	<b>Reporting</b>	<p><u>Biannual Status Reports</u></p> <p>The third party SEP recipient will submit a biannual project status report to the department's SEP Coordinator. Status reports will include the following information:</p> <ul style="list-style-type: none"> <li>• A description of activities completed to date;</li> <li>• A budget summary table listing funds expended to date by budget category; and</li> <li>• A discussion of any anticipated changes to the project scope or timeline.</li> </ul> <p><u>Final SEP Completion Report</u></p> <p>The SEP Completion report will be submitted within 30 days of project completion and contain at a minimum:</p> <ul style="list-style-type: none"> <li>• A detailed description of the project as implemented;</li> <li>• A summary table identifying project deliverables and tasks along with the associated completion date;</li> <li>• A description of any operating problems encountered and the solutions thereto;</li> <li>• A full expense accounting including itemized costs, documented by copies of purchase orders, contracts, receipts or canceled checks;</li> <li>• Certification and demonstration that the SEP has been fully implemented pursuant to the provisions of the Settlement Agreement and this SEP Agreement;</li> <li>• A description of the environmental and public health benefits resulting from implementation of the SEP along with <b>quantification</b> of the outcomes and benefits;</li> </ul> <p>Additional information should include:</p> <ul style="list-style-type: none"> <li>• Examples of brochures, educational or outreach materials developed or produced as part of the SEP; and</li> <li>• Photographs documenting the project.</li> </ul>
<b>Other Relevant Information</b>		
<p><b>Has the applicant entered into any prior commitments to fund this project, voluntary or otherwise? If yes, please explain.</b></p>	No.	