

River Glen Homeowners' Association

PO Box 1251

Berthoud, CO 80513

Audit Response

20.June.2013

Colorado Dept of Public Health and Environment (CDPHE)
Field Services Section
Attn: Christine Lukasik
4300 Cherry Creek Drive, South
Denver, CO 80246-1530

Subject: Official response to audit, permit number CO-0029742, audit performed 02.may.2013, audit report dated 29.may.2013

Dear Christine,

Thank you for your patience with us during audit of our facility called "Riverglen" back on 02.may. Thank you also for the well-detailed list of improvement suggestions in your audit report. This list will surely help us to improve our compliance, as well as improve the performance of our system. Itemized replies below, numbered symmetrically with the numbering in your report.

Alleged Violation 1: Compliance schedule

- We believe that RGHOA has indeed met the milestones of the compliance schedule. Sadly, we were unable to provide adequate documentation on the audit date to prove this claim.
- As requested, signed copy of the 15.february letter is included here as detailed in your report.
- Additionally, we have asked Bret Icenogle at state office to search for copy of the second letter (milestone requirement 31.dec.2012), but as of this date, Bret has not replied.
- Additionally, we have provided here a letter from our primary contact at Larimer County office, attesting to our compliance with the required milestones.
- See attachment number 1 (X pages total)

Alleged Violation 2: Biosolids practices

- I have communicated with Tim Larson, and submitted to Tim an ex-post-facto report for 2010 and for 2011. Copies of all three years are attached here for your review
- We have established a file folder at our facility specifically for keeping paper copies of all biosolids reports, currently five years on file
- See attachment number 2 (X pages total)

Alleged Violation 3: Data inaccurate on DMRs

- We have collected DMRs from state office for first quarter of 2011, and for second quarter of 2013 as requested.
- We have initiated communication with the two laboratories with whom Riverglen has done business since 2011, and requested laboratory results for the two quarters in question.
- We request more time to complete our necessary actions for this alleged violation. Specifically, we request your flexibility to permit us to resolve this item no later than 15.August.2013

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Alleged Violation 4a: Flowmeters not properly calibrated

- We have scheduled a visit from a flow-measurement expert to provide third-party calibration of both of our palmer-bowlus systems. Once complete, we will provide calibration reports for both units.
- We have asked our calibration provider to also review position of the secondary measuring device (the ultrasonic xducer) with respect to the D/2 location requirement. The conclusions from that assessment will also be noted on the calibration report.
- We request more time to complete our necessary actions for this alleged violation. Specifically, we request your flexibility to permit us to resolve this item no later than 15.August.2013

Alleged Violation 4b: Handheld devices not properly calibrated

- We do indeed have three handheld testing devices which could be calibrated. Those are:
 - Dissolved oxygen meter, model YSI 550A
 - Colorimeter, Hach model II
 - pH meter, Hach model Sension 2
- We will take steps to have these devices calibrated, but without disruption to our normal operation (we cannot currently ship these away, because we have no replacement)
- We request more time to complete our necessary actions for this alleged violation. Specifically, we request your flexibility to permit us to resolve this item no later than 15.August.2013

Alleged Violation 4c: Aerator not functional

- We have repaired our aerator in lagoon number 2, by purchasing an identical motor of the identical model. This is a repair, not a new aerator, and it is the same model that has been in operation at our facility since original site location approval. Both aerators have now been functioning reliably since approximately 25.may.2013
- See attachment number 4c (X pages total)

Alleged Violation 5: Failure to maintain records

- Our previous operator left us no data in the way of daily log sheets, COCs, lab results, etc
- We have established a filing system at our facility to keep paper records of all DMRs, and currently have all DMRs available for the past three years at our facility.
- We have established filing folders for equipment calibration records, including but not limited to influent and effluent flow measurement devices.
- Our new operator (Bob) brings to our facility a long history of much improved practices and habits for maintaining log sheets detailing activities from each day's visit.
- Attached photos show some excerpts from the log-book that Bob has been maintaining since he took over as ORC for our facility. Also attached are photos of our improved filing system for other types of records. We are lucky to have Bob's help and broad experience.
- See attachment number 5 (X pages total)

River Glen Homeowners' Association

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Tabular Summary:

Alleged Violation Number	Attachment Number	Does Riverglen currently plan additional actions?
1	1	No – we request you consider to close
2	2	No – we request you consider to close
3		Yes – we request extension until 31.July
4a		Yes – we request extension until 31.July
4b	4b	No – we request you consider to close
4c	4c	No – we request you consider to close
5	5	No – we request you consider to close



Michael Dower
Primary Contact
Riverglen homeowner and sewer chairman



Bob Airhart
ORC

calibration history for pH meter and chlorine meter

May 2013 P1A

5/3 4.7, 10 R_{2A}C₁₂ 0.05/4 4.7, 10 R_{2A}C₁₂ 0.05/11 4.7, 10 R_{2A}C₁₂ 0.05/12 4.7, 10 R_{2A}C₁₂ 0.05/13 4.7, 10 R_{2A}C₁₂ 0.05/14 4.7, 10 R_{2A}C₁₂ 0.05/24 4.7, 10 R_{2A}C₁₂ 0.05/28 4.7, 10 R_{2A}C₁₂ 0.0

June 2013

6/2 4.7, 10 R_{2A}C₁₂ 0.06/7 4.7, 10 R_{2A}C₁₂ 0.06/9 4.7, 10 R_{2A}C₁₂ 0.0

Typical pages in log book, maintained by new operator and stored permanently at facility

Mine Cell 303-408-5862

5/12 Plant Mowing - checks - Chart change

Cl₂ EFF = .03 Cl₂ RA H9 5/14

5/13 Plant ops Cl₂ RA 10:00
Cl₂ .03 RA

5/22 Plant check - Sun May 19 Generator Repair

5/16 5422486

5/18 5427315

5/24 5459037

5/26 Plant mowing - Plant ops -

PH 4.7, 10 RA

5/26 In PH = 7.95 RA 8 gal

EFF PH = 8.17 RA

EFF Cl₂ = .03 RA

PH 4.7, 10 RA

5/28 In PH 8.01

PH EFF 8.00

Cl₂ .04 RA

LAB
6/2 PH On - 4.7, 10 5487019
PH INF 7.80 RA
EFF 7.32 RA

Cl₂ EFF .22 RA
O+L N/V Add 8 gal ✓
Lawn Mowing - weed Trimming

6/9 5509597 - New Chart

PH

INF 8.00

EFF 8.00

Cl₂

EFF RA 0.29 RA

O+L N/V

Tripple 6 Electric

970-310-9086

CR 15 Wagon wheel Ct.

6/10 Lift Station Fair

6/11 Order Parts

6/12 Station Down

Note:
Folders for DMR records by year





Aerator in cell number 2, same unit, same specifications, but with new encapsulated motor, functional since 19.may.2013

Calibration records for pH meter and colorimeter

May 2013 P_{1A} 5/3 4,7,10 R_{2A} C_{12} 0.05/4 4,7,10 R_{2A} C_{12} 0.05/11 4,7,10 R_{2A} C_{12} 0.05/12 4,7,10 R_{2A} C_{12} 0.05/13 4,7,10 R_{2A} C_{12} 0.05/14 4,7,10 R_{2A} C_{12} 0.05/24 4,7,10 R_{2A} C_{12} 0.05/28 4,7,10 R_{2A} C_{12} 0.0

June 2013

6/2 4,7,10 R_{2A} C_{12} 0.06/7 4,7,10 R_{2A} C_{12} 0.06/9 4,7,10 R_{2A} C_{12} 0.0

SECTION 3, continued

Calibration procedure for pH sensor,
now stored inside our O&M manual

3.1.8 Setting the Year

1. From the reading mode, press **SETUP**.
2. The **Setup** icon and the number 1 (flashing) will be displayed. Press the up arrow until the Setup number is 8.
3. Change the year by pressing **ENTER**. The main display will change to _ _ _ , with the left place holder flashing. The numerical keypad will become active.
4. Press the desired number key for the left-most digit. Once a number key is pressed, the next digit place holder will flash. Continue to enter the desired numbers until all four places have a value. Press **ENTER** to accept the value.
5. If an number entry error occurs, start over by pressing **SETUP/CE**.

3.2 pH Calibration

The *sension2* pH/ISE Meter is designed to auto-recognize and calibrate on 4.01, 6.86 or 7.00, and 10.00 pH buffers. Calibrating with buffers that have pH values other than these requires a modified procedure (see *Section 3.2.2*).

Hach recommends a daily two-point calibration using buffers that bracket the sample pH. This will verify the electrode is working properly and allow the slope value to be stored.

3.2.1 Performing a Calibration Using pH 4, 6.86, 7, and 10 Buffers

1. If using a probe without a temperature sensor, see *Section 2.3.2* on page 28 and 2.6 on page 28 for information about setting and using a default temperature.
2. Prepare 4.01 and 7.00 (or 6.86) or 7.00 (or 6.86) and 10.01 pH buffers according to the electrode instruction manual.

Note: Use a 6.86 or 7.0 pH buffer for the mid-range buffer. To view or change the setting for the mid-range buffer see Section 3.1.5.

Note: The pH values for the buffers are given for 25 °C. If the sample temperature is not 25 °C, the pH values displayed for the buffers will reflect the correct pH value for the sample temperature.

Continued Next PAGE

SECTION 3, continued

3. Press **I/O/EXIT** to turn the instrument on. If necessary, press the **pH/mV** key to get into the pH reading mode (pH will be displayed).
4. From the pH reading mode, press **CAL**. **CAL** and ? will appear in the upper display area, along with **Standard** and 1.
5. Place the pH electrode in one of the buffers.
6. Press **READ/ENTER**. The temperature and pH values will be updated until a stable reading is reached.

*Note: If the meter is measuring in pH mode, it automatically moves to the next calibration step when stabilization is reached (indicated by three beeps). If measuring in mV mode, the three beeps will still sound when the stabilization occurs, but you must press **ENTER** to accept the reading. This lets the operator control the acceptance point of the buffer.*

7. When the reading has stabilized or been accepted, the standard number will change to 2.
8. Remove the probe from the first buffer and rinse with deionized water. Place the probe in the second buffer.
9. Press **READ/ENTER**. The temperature and pH values will be updated until a stable reading is reached.
10. When the reading has stabilized or been accepted, the standard number will change to 3.
11. Repeat steps 8 and 9 for the third buffer or press **EXIT**. In either case, the slope value and the **Store** and ? icons will appear. Verify the slope value is within the ranges specified in the electrode manual.
12. To save the calibration and return to the reading mode, press **ENTER**. To exit the calibration without saving it and return to the reading mode, press **EXIT**.

DONE:

Calibration procedure for colorimeter,
currently stored inside our O&M manual

Standard Calibration Adjust

The Pocket Colorimeter™ II instrument is factory-calibrated and ready for use without user calibration. Use of the factory calibration is recommended unless the user is required to generate a calibration. The Standard Calibration Adjust can be used to meet regulatory requirements.

This feature allows the factory default calibration curve to be adjusted with a known standard. Use the standard described in the procedure.

1. Place a blank in the meter (in measurement mode). Press **ZERO/SCROLL**.
2. Place the reacted standard in the meter. Press **READ/ENTER**.
3. Press **MENU**, then press the **ZERO/SCROLL** key until the display shows "SCA".
4. Press **READ/ENTER** to display the standard calibration adjust value.
5. Press **READ/ENTER** to adjust the curve to the displayed value. The meter will return to the measurement mode and the "calibration adjusted" icon will appear in the display window.

If an alternate concentration is used, or if a standard concentration is not given:

6. Repeat steps 1-4.

Standard Calibration Adjust, continued

7. Press **ZERO/SCROLL** to access the Edit function, then press **READ/ENTER** to begin editing. The digit to be edited will flash. Use the **ZERO/SCROLL** key to change the entry, then press **READ/ENTER** to accept and advance to the next digit.

When the last digit is entered, press **READ/ENTER** and the meter will adjust the curve to the value entered. The meter will return to measurement mode and the "calibration adjusted" icon will appear in the display window.

To turn off Standard Calibration Adjust:

1. Press **MENU**.
2. Press **ZERO/SCROLL** until "SCA" appears in the display.
3. Press **READ/ENTER**, then press **ZERO/SCROLL** until "Off" appears in the display.
4. Press **READ/ENTER** to turn off SCA.

Note: Perform another standard calibration adjust to turn SCA "on" again.

Note: For meters with factory-calibrated ranges or methods, Standard Calibration Adjust (SCA) will be disabled when a user-entered method is programmed into the meter. To turn SCA back on, restore the meter to factory default calibration. See Retrieving the Factory Calibration on page 2-23.



USA EPA Region 8/CDPHE-Water Quality Control Division
BIOSOLIDS ANNUAL REPORT

For 2010



SECTION I – BIOSOLIDS LAND APPLICATION REPORT

By Authority of 40 CFR Part 503 and Regulation 64, this form is to be used by generators and distributors to report biosolids applied to the land (beneficially used) which are subject to 40 CFR Part 503 and Regulation 64.

The information provided herein will be used to determine fees to support the program in accordance with Regulation 64.

REPORTS ARE DUE February 19, _____

Please note: All Treatment Works Treating Domestic Sewage (TWTDS) are required to complete and return this form.

**** If you hauled liquid biosolids to another facility, list the amount hauled and the haulers name.**

REQUIRED INFORMATION - TO BE COMPLETED BY GENERATOR OR DISTRIBUTOR. (Please type or print.)

FACILITY NAME			NPDES and/or State Permit Number
Riverglen Homeowners' Association			Discharge permit number CO-0029742
FACILITY ADDRESS			TELEPHONE NO.
(Near) County road 17 and Wagonwheel Court			303.408.5862 (Homeowner contact for this facility)
CITY	STATE	ZIP	CONTACT PERSON
Berthoud	CO	80513	Michael Dower (Homeowner contact)
DURING CALENDAR YEAR 2010 (1/1/2010 - 12/31/2010), THE GENERATOR/DISTRIBUTOR NAMED ABOVE LAND APPLIED			
Zero DRY METRIC TONS OF BIOSOLIDS		Zero DRY METRIC TONS OF BIOSOLIDS TO LANDS WITHIN THE STATE OF COLORADO	
Zero TOTAL DRY METRIC TONS OF BIOSOLIDS GENERATED		Zero TOTAL DRY METRIC TONS LANDFILLED	
		Zero TOTAL DRY METRIC TONS INCINERATED	
		Zero TOTAL DRY METRIC TONS TRANSPORTED OUT OF STATE	
Zero TOTAL GALLONS TRANSPORTED TO ANOTHER WASTEWATER TREATMENT FACILITY			
NA RECEIVING FACILITY NAME			
NA HAULERS NAME			

To convert the English system (short tons) to metric tons, use the following equation: DRY METRIC TONS = DRY SHORT TONS x .907

I certify that the information as provided on this form is true.

Signature of Authorized Representative

Michael Dower, Homeowner contact

13.June.2013 (retroactively filed)
Date

REQUIRED INFORMATION. COMPLETE TO ENSURE YOU RECEIVE YOUR INVOICE IN A TIMELY MANNER.

MAILING NAME			
Riverglen HOA, attn: Michael Dower			
MAILING ADDRESS			
PO Box 1251			
MAILING CITY	STATE	ZIP	CONTACT PERSON and EMAIL ADDRESS
Berthoud	CO	80513	Michael Dower (Michael.dower@emerson.com)

IF YOU HAVE ANY QUESTIONS ABOUT COMPLETING THIS FORM, PLEASE CONTACT THE BIOSOLIDS STAFF PERSON AT CDPHE

PLEASE RETURN COMPLETED FORM TO:

BIOSOLIDS PROGRAM
CDPHE-Water Quality Control Division
WQCD-WQP-B2
4300 Cherry Creek Dr. S.
Denver, CO 80246-1530

Important Note:

During state audit 02.may.2013, the auditor explained that we are expected to be able to keep paper copies of annual biosolids reports at our facility for review by state personnel. Our previous operator (Ben Golemon) stated that he had filed this report for Riverglen, but after contacting Tim Larson (303.691.4091) at state office, it was discovered that no such report was on file with CDPHE. This report has therefore been submitted retroactively.

2/2011)

USA EPA Region 8/CDPHE-Water Quality Control Division
BIOSOLIDS ANNUAL REPORT**For 2011****SECTION I – BIOSOLIDS LAND APPLICATION REPORT**

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Riverglen Homeowners' Association		Discharge permit number CO-0029742	
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(Near) County road 17 and Wagonwheel Court		303.408.5862 (Homeowner contact for this facility)	
CITY	STATE	ZIP	CONTACT PERSON
Berthoud	CO	80513	Michael Dower (Homeowner contact)
DURING CALENDAR YEAR 2011 (1/1/2011 - 12/31/2011), THE GENERATOR/DISTRIBUTOR NAMED ABOVE LAND APPLIED			
Zero DRY METRIC TONS OF BIOSOLIDS		Zero DRY METRIC TONS OF BIOSOLIDS TO LANDS WITHIN THE STATE OF COLORADO	
Zero TOTAL DRY METRIC TONS OF BIOSOLIDS GENERATED		Zero TOTAL DRY METRIC TONS LANDFILLED	
		Zero TOTAL DRY METRIC TONS INCINERATED	
		Zero TOTAL DRY METRIC TONS TRANSPORTED OUT OF STATE	
Zero TOTAL GALLONS TRANSPORTED TO ANOTHER WASTEWATER TREATMENT FACILITY			
NA RECEIVING FACILITY NAME			
NA HAULERS NAME			

To convert the English system (short tons) to metric tons, use the following equation: DRY METRIC TONS = DRY SHORT TONS x .907

I certify that the information as provided on this form is true.

 Michael Dower, Homeowner contact 13.June.2013 (retroactively filed)
Signature of Authorized Representative Date

REQUIRED INFORMATION. COMPLETE TO ENSURE YOU RECEIVE YOUR INVOICE IN A TIMELY MANNER.

MAILING NAME			
Riverglen HOA, attn: Michael Dower			
MAILING ADDRESS			
PO Box 1251			
MAILING CITY	STATE	ZIP	CONTACT PERSON and EMAIL ADDRESS
Berthoud	CO	80513	Michael Dower (Michael.dower@emerson.com)

IF YOU HAVE ANY QUESTIONS ABOUT COMPLETING THIS FORM, PLEASE CONTACT THE BIOSOLIDS STAFF PERSON AT CDPHE

PLEASE RETURN COMPLETED FORM TO:
BIOSOLIDS PROGRAM
CDPHE-Water Quality Control Division
WQCD-WQP-B2
4300 Cherry Creek Dr. S.
Denver, CO 80246-1530**Important Note:**

During state audit 02.may.2013, the auditor explained that we are expected to be able to keep paper copies of annual biosolids reports at our facility for review by state personnel. Our previous operator (Ben Golemon) stated that he had filed this report for Riverglen, but after contacting Tim Larson (303.691.4091) at state office, it was discovered that no such report was on file with CDPHE. This report has therefore been submitted retroactively.

2/2011)

Dower, Michael [PROCESS/BOUL]

From: Dower, Michael [PROCESS/BOUL]
Sent: Thursday, June 13, 2013 10:30 AM
To: 'Larson - CDPHE, Tim'
Subject: RE: biosolids annual report
Attachments: Biosolids EPA permit 2009.pdf; Biosolids Report 2008.pdf; Biosolids Report 2009.pdf; Biosolids Report 2010.pdf; Biosolids Report 2011.pdf

Got it thanks for that quick email Tim.

Here are biosolids reports for four years that you can please store in the state system.

Note that for 2010 and 2011, they are retroactive (signed today, as replacement submittals to cover those years where my operator reported submitting on our behalf).

If you cannot find the 2012 report next week for our organization, then I can easily do the same for 2012 as I did for 2011 and 2010

Thanks again, Tim

Michael Dower | Engineer | Micro Motion, Inc.
Emerson Process Management | 7070 Winchester Circle | Boulder | CO | 80301
T +1 303 530 8473 | Mobile 303.408.5862 | michael.dower@emerson.com

From: Larson - CDPHE, Tim [<mailto:tim.larson@state.co.us>]
Sent: Tuesday, June 11, 2013 2:48 PM
To: Dower, Michael [PROCESS/BOUL]
Subject: biosolids annual report

Mike,

It was good to talk with you today. Here is the web address to get you to the State of Colorado biosolids web site:

<http://www.colorado.gov/cs/Satellite/CDPHE-WQ/CBON/1251596875177>

I will send you a copy of the 2012 Riverglen HOA Biosolids annual report, hopefully by next week.

Let me know if you have any other questions.

Thanks,
Tim

Tim Larson
Biosolids Specialist
WQCD-Permits-B2

Note:

Folder at facility dedicated to storing biosolids reports



Attachment 1

Page 1 of 3

River Glen HOA
P.O. Box 1251
Berthoud, CO 80513

February 15, 2012

Mr. Bret Icenogle, P.E.
Manager, Engineering Review Unit
Colorado Department of Public Health &
Environment Water Quality Control Division
4300 Cherry Creek Drive South
Denver, CO 80246-1530


Re: Permit #CO-0029742

Dear Mr. Icenogle,

Pursuant to the requirements of our sanitation system permit, this letter will confirm that we have participated with Larimer County to retain JVA, Inc. of Boulder, CO to review our options for a change to our current sanitation system which will comply with the requirements of the permit. We have received a planning grant from Colorado DOLA in the amount of \$10,000 which will be used to pay a portion of the fees to JVA.

If you have questions or need further information, please contact me: 303-478-6904 or jbstapp@comcast.net.

Sincerely,


Julia B. Stapp
Vice President
River Glen HOA Board of Directors

Note:

Signature added as requested



DEPARTMENT OF HEALTH AND ENVIRONMENT

Attachment 1

Page 2 of 3

1525 Blue Spruce Drive
Fort Collins, Colorado 80524-2004
General Health (970) 498-6700
Environmental Health (970) 498-6775
Fax (970) 498-6772

June 17, 2013

Mr. Mike Dower
River Glen Homeowners Association
P.O. Box 1251
Berthoud, Colorado 80513

Dear Mike:

The purpose of this letter is to give a brief outline of and verify the accomplishments that have been made with River Glen Homeowners Association (RGHOA) in an attempt to comply with requirements of the Compliance Order issued by Colorado Department of Public Health and Environment, Water Quality Control Division (WQCD), relative to the wastewater treatment system for River Glen Estates and Riverside Farms in Larimer County. Following is a very brief explanation of the efforts and progress made by the subdivisions in an effort to comply.

River Glen Estates HOA contacted LCDHE in late 2010 requesting assistance in solving their wastewater treatment issues and complying with the WQCD Compliance Order. In 2011, RGHOA and LCDHE entered into an agreement to have the department assist the association in obtaining a grant for the purpose of hiring an engineering firm to prepare an environmental study to comply with the state's Compliance Order. LCDHE applied for and was issued a Revolving Fund Pre-Loan Planning/Design Grant in the amount of \$10,000 from Colorado Water Resources and Power Development Authority. The homeowners contributed \$13,500 to the Department. These funds were used to hire a consulting engineer, JVA, Inc., to perform a Preliminary Engineering Study on the wastewater needs of the subdivisions. The PER was presented to the homeowners of River Glen Estates and Riverside Farms on August 2, 2011 and August 15, 2011. The homeowners of these two subdivisions voted overwhelmingly to pursue an alternative of consolidating wastewater treatment with the Town of Berthoud.

On February 23, 2012, the residents of the two subdivisions voted to proceed to the Board of County Commissioners to form a Local Improvement District for the purpose of constructing the facilities necessary to connect to the Town of Berthoud. The Board of Commissioners held a public hearing on July 17, 2012 approving the Local Improvement District to proceed to election to be held on November 6, 2012. The election passed 90.08% in favor.

Following the election, the County applied for a State Revolving Fund Loan in December 2012. The loan was approved and closed on today, June 17, 2013. In addition, agreements with the Town of Berthoud addressing service and operation and maintenance of the lift station by the town have recently been signed by the Town and the two subdivisions. Engineering work will now continue with JVA, Inc. beginning work on the design documents within the next couple of weeks or as soon and the County issues the Purchase Order to proceed. If we get timely design documents and approval of the documents by the WQCD, construction is expected to start this fall and be finished in March 2014.

You may include a copy of this letter in your correspondence with WQCD regarding the efforts of the residents of these two subdivisions to comply with the Compliance Order. If you or anybody at the State has any questions, please feel free to contact me at 970-498-6778.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ed Schemm', with a long horizontal flourish extending to the right.

Ed Schemm, Assistant Director
of Environmental Health