

RMWEA/RMSAWWA Joint Water Reuse Committee  
March 10, 2005  
Aurora Municipal Center, Aurora, CO

Attendees: John Rehring, Tara Kelley, Matt Hirschbeck, Wesley Carr, Frank Johns, Rhonda Sandquist, Scott Lehman, David Carter, Jenny Fifita, Kristi Riegle, Paul Kottenstette, Claudia Cummins, Jane Fisher, Shelley Stanley, Ron McLaughlin, Natalie Smith, Dave Akers, Steve Fisher

1. Other Reuse Committee Business

- Salinity Subcommittee Report: The study is almost ready to begin. Meetings are scheduled for the 4<sup>th</sup> Wednesday of each month at the City of Westminster reuse facility. The next meeting is on Wednesday, March 25, 2005. The group is currently looking to develop a document that will have some information on how to tackle salinity issues, such as reducing the amount of softeners used or choosing salt-tolerant plants for landscaping.
- Monitoring Policy/Agronomic Rate updates: These documents will be worked on after the updates to Regulation No. 84 and the corresponding SOBP are completed. Brian Good (Denver Water) indicated that he would work on refining the Agronomic Rate policy and specifically the phosphorus uptake piece. Claudia thought we would leave the phosphorus out of the Agronomic Rate policy and we were only going to look at the amount of water that we are applying (i.e., using ET rates or other methods). It was suggested that Brian contact Nicole A. to see what information she has already compiled. Claudia will work with Steve L. on the Monitoring Policy. We will also need to revisit the Noncompliance Policy for E. coli in the future. We will work on these projects after finishing up what we are currently working on.
- WateReuse Symposium planning: There are still opportunities to help out. Paul and John are organizing tours. Five Utilities (Westminster, Aurora, Denver, Lewisville and possibly Broomfield) are interested in participating in the tour. Sites will need to be chosen from these locations. It might be beneficial to also visit an industrial site (i.e., Excel), an applicator site, and a treatment facility(s). The tour will need to be solidified by the end of this month. Claudia is organizing the President's reception. There may be a location for the golf tournament, but no solid plans have been made. Because of the influx of submitted papers, the conference has been extended ½ day before and after the normal schedule.
- Other business: The abstracts are due on April 1, 2005 for the RMWEA/RMSAWWA Conference to be held in Albuquerque, NM, on September 10-14, 2005 abstracts.

2. Modifications to Regulation No. 84

- Update to Commission hearing timeline: We provided the following schedule: March 30 – Formatted proposal due to the WQCC admin  
April 11 – WQCC approves notice

May 31 – Party status request  
June 8 – Proponents prehearing  
July 7 – Prehearing conference  
July 27 – Rebuttals  
August 8 - Hearing

We are shooting for draft of the modified Regulation No. 84 by March 11<sup>th</sup> and a revised SOBP by 3/17.

- Definition of “single family residential” for Category 3 requirements: An email was sent prior to the meeting by Tara Kelley questioning whether we needed to clarify the definition of “single family residential irrigation” (SFRI) to distinguish it from single-family or duplex rental properties or the like whose irrigation systems were owned and operated by a central management company such as a HOA or college. Kristi indicated whether we also would need to modify the definitions of unrestricted and restricted access as well as landscape irrigation to avoid confusion. The group decided to change the definition of SFRI to resident-controlled landscape irrigation to also indicate that this means the occupant of the home has access to the plumbing system, timers, etc. The reference to SFRI will be changed throughout the document to resident-control landscape irrigation. Other changes included splitting the current (4) footnote after 84.8.(A). The first two sentences will apply to landscape irrigation (unrestricted use) and resident-controlled landscape irrigation (Category 3), and the rest of footnote (4) will be moved to a footnote (5), and the current footnote (5) will be changed to footnote (6). In addition, the language under footnote (4) will change to say residential structure as opposed to “property” and “residence”.
- The issue of developing an exclusion for vegetable gardens at residences was raised by Wes as it may be a topic that the WQCC may question. At this point the Committee has not officially determined which category water, if any, would be suitable for vegetable gardens at any location. The group determined we’d table that until a later date and not specifically prohibit it in the Regulation at this time.
- Continuous disinfection under 84.7 (C) for Category 3 standards: Claudia questioned why we would need to state continuous disinfection when we are requiring disinfection already? It was discussed that we need to ensure that the chlorine system or UV system was on continuously (not intermittent). The group decided to include this requirement in the Monitoring Policy. The language will be taken out of the Regulation at this time and addressed in the SOBP. Once incorporated into the Monitoring Policy, ensuring continuous disinfection will be a requirement for all user categories, and will need to be addressed in the Annual Report.
- Access to homes: 84.9 (D) (2): The group decided to add the word “reasonable” before access. It was agreed that most utilities have access to customers properties through internal policies.
- SOBP: Scott reworked it to more mimic the SOBP from the last time around. The first page is pretty much what was done last year (boiler plate). Page two addresses specific changes in the Regulation. Rhonda’s information was

incorporated. It was decided to add the requirement for potable hose bibs on residential structures issue under Category 2. We need to also address the continuous disinfection requirement. Dave/Wes/Rhonda will need to add some language to page 2 of Scott's SOBP under the Regulation 61/72/73/84 nexus. The word "public" in the first paragraph on page 3 will be changed to say "personal".

- Scott will revise the Regulation again, and Dave A. will modify the SOBP. The question was raised where the liability would lie using the following proposed language in the SOBP: "In order to avoid the need to commit an excessive amount of Division resources for regulatory oversight when Category 3 reclaimed water is used, section 84.9 (A)(6) requires the treater to assume responsibility for the numerous smaller users inherent when reclaimed water is used for single family residential irrigation and there is not an acceptable entity (e.g. homeowners' association) to assume said responsibility." It was suggested by Dave that in this case, each individual homeowner would have a general NOA.

The next meeting is scheduled for April 14, 2005 at the Arcadis office located in Highlands Ranch, CO.