

Bear Creek Watershed Association

March 6, 2014

BCWA Interim Policy 24 – DMR Reporting to Association



Statement of Basis and Purpose

The regulated community is required to submit discharge monitoring reports (“DMRs”) to the Water Quality Control Division permitting section. The sample collection and analytical results required by the Colorado Discharge Permit System (“CDPS”) permits must be reported through the submission of DMRs (EPA Form 3320-1). DMRs can be submitted electronically. All wastewater treatment facilities in the Bear Creek Watershed are required to submit monthly DMRs to the WQCD.

The Bear Creek Reservoir Control Regulation at 5 C.C.R. 1002-74 requires the Association to develop and submit annual reports to the Water Quality Control Commission and WQCD, including information on permit loading and compliance with permit limitations for all wastewater dischargers in the watershed. The Association is also annually responsible for reporting if all permits issued by the WQCD for wastewater treatment facility discharges remain consistent with the control regulation, standards and classifications of discharge waters.

The Association includes in each annual report the total phosphorus loading for the previous year and a summary of facility compliance. The Association gathering of annual compliance information from some permitted dischargers has been problematic. In the past, the WQCC has been critical of the Association for not keeping closer tracking of compliance for small dischargers.

The new Regulation #85 for nutrients has required more nutrient and flow monitoring by all surface dischargers in the watershed. The Association has begun upstream/ downstream sampling for certain dischargers in the watershed. Monitoring requirements established by State Control Regulation #85 are designed to evaluate the effectiveness of and to determine the sources and load of nutrients at selected locations, and eventual implementation of appropriate and necessary source controls. The Bear Creek Association watershed monitoring plan includes monitoring elements for wastewater treatment facilities in the watershed, which allows these facilities to meet monitoring requirements in Regulation #85.

Implementation of Regulation #85 monitoring is a requirement of permitted surface water dischargers and is not a specific monitoring requirement of the Association. However, the Association board has determined that integrating the new monitoring requirements from Regulation #85 into the Association watershed monitoring plan Regulation #74 could serve to improve water quality management in the watershed and have a shared funding benefit. A combined monitoring effort can meet state requirements, but, as importantly, it is an opportunity for the Association to develop a more comprehensive and holistic nutrient management plan that will protect and improve water quality throughout the watershed. The wastewater treatment plants that have volunteered to coordinate effluent sampling with the stream sampling effort are shown in Table 1.

Table 1 Wastewater Treatment Plants Involved in a Coordinated Monitoring Plan

Wastewater Treatment Works	Coordinated with Monthly Stream Samples	Not Coordinated
Bear Creek Drainage		
Singing River Ranch		No Sample
JCS Outdoor Lab		No Sample
Brookforest Inn		x
Evergreen Metro District	x	
Bear Creek Cabins		x
West Jefferson County Metro District	x	
Kittredge Water and Sanitation District	x	
Genesee Water and Sanitation District	x	
Forest Hills Metro District	x	
Morrison		x
Turkey Creek Drainage		
Aspen Park Metro District		x
Conifer Metro District		No Sample
Conifer Sanitation Association	x	
JCS Conifer High School	x	
Tiny Town		x
Geneva Glen		No Sample
The Fort		No Sample

The Association needs to do better monthly tracking of effluent from all wastewater dischargers within the watershed. Providing monthly DMR information to the Association can improve compliance tracking and reporting by the Association.

Policy Positions

(The policies are not formally adopted by the Board; rather they are under review for effectiveness and workability).

1. *The Association encourages all permitted wastewater treatment facilities submit an electronic copy (preferred) or paper copy (for electronic conversion) of the monthly DMR that is a duplicate of the form submitted to the WQCD to the Association manager.*
2. *The Association manager shall receive electronic notification of any permit compliance problem within 30-business days, if DMRs are not submitted to Association.*
3. *The Association data management system will retain an electronic copy (PDFs) of reported DMRs or permit compliance problems by permitted facility. This may include permit compliance issues as reported on the EPA ECHO system/site.*
4. *The annual reporting to the WQCC of wastewater facility compliance will be based on reported DMRs or EPA ECHO listings. Failure to submit DMRs to the Association may result in a notice of “noncompliance with the control regulation” listing in the reporting table for such dischargers in the annual report to the WQCC.*