



July 30, 2018

Dayton and Leah Orsburn, Co-Trustees  
Arrowhead Mobile Home Park  
PO Box 154  
Chino Hills, CA 91709

Subject: Site Location Application - Request for Information  
Arrowhead Mobile Home Park, Lift Station  
Associated WWTF CDPS Permit No. COX048348  
El Paso County  
ES Project No. ES.17.SA.03578, Enforcement Order Number DO-160518-1

Dear Ms. Martinez:

The Water Quality Control Division (Division) has reviewed the Arrowhead Mobile Home Park (MHP) Lift Station Site Application submission by Element Engineering, LLC on behalf of Dayton and Leah Orsburn, Co-Trustees. Based on the Division's initial review, the site location application does not meet the requirements of the Water Quality Control Commission's *Site Location and Design Approval Regulations for Domestic Wastewater Treatment Works, 5 CCR 1002-22* (Regulation 22) and cannot be approved at this time. For additional information, please refer to the *Guidance Document for the Site Location and Design Approval Regulations for Domestic Wastewater Treatment Works, 5 CCR 1002-22* (Guidance Document), which is available at <http://www.colorado.gov/cdphe/wq-guidance> under the "Clean water regulatory guidance" heading.

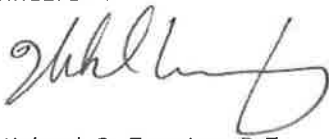
1. In accordance with Section 22.7(1)(f)(iii) of Regulation 22, the applicant shall provide an adequate engineering report that shall provide confirmation, in writing, from the wastewater treatment entity that it has not been in violation of any effluent limitations in its discharge permit for the last two years and is not operating under a Notice of Violation and/or Cease and Desist Order from the Division resulting from discharge permit violations. Alternatively, if there have been effluent violations or if the treatment plant is operating under a Notice of Violation and/or Cease and Desist Order from the Division, then the Division will evaluate the situation and the treatment entities' proposed corrective measures to achieve consistent compliance and determine if approval should be granted, granted with conditions, or denied. In addition, Section 22.3(2)(a) of Regulation 22 specifies that each application for site location approval shall be reviewed to ensure that the existing treatment works will not be overloaded when connecting new lift stations. The engineering report identifies that Cherokee Metropolitan District (CMD) will be responsible for treating the wastewater from the Arrowhead MHP lift station. CMD is currently operating under the terms of a Compliance Order on Consent (COC), in part, for violating the total dissolved solids (TDS) limitation established in the facility's discharge permit. The COC includes an implementation plan and compliance schedule for meeting the TDS limitations, but current discharge data indicates that the TDS limitation continues to be exceeded. Based on sampling data provided, wastewater from Arrowhead MHP appears to be in excess of the 400 milligrams per Liter (mg/L) TDS limitation established in CMD's discharge permit. Therefore, if Arrowhead MHP were to connect to CMD through the proposed lift station, Arrowhead MHP may contribute to CMD's exceedance of the TDS limitation. Please demonstrate how the additional flow and load from Arrowhead MHP will not contribute to overloading CMD's existing water reclamation facility considering that the facility is currently exceeding its effluent limitation for TDS. Note, treatment for TDS may be required at Arrowhead MHP to ensure TDS contributions do not add to CMD's exceedances.
2. In accordance with Section 22.7(2) of Regulation No. 22, the application shall be forwarded to the city, town, or county in whose jurisdiction(s) the lift station and/or interceptor sewer is to be located for review and comment, and in accordance with Section 22.7(3) of Regulation No. 22, the application



shall be forwarded to the 208 planning agency for the area in which the facilities are to be constructed and for the area to be served by those facilities for review and comment. While the site application appears to have been forwarded to El Paso County, El Paso County Public Health, and the Pikes Peak Area Council of Governments, a response from the review agencies was not provided with the site application submittal. Please submit the signature portion of the site application form to the Division with the review agencies acknowledging that they had the opportunity to review and comment on the site application.

Please submit a written response to this letter that addresses the identified issues. Following receipt of your response submission, the Division will resume review work on the project. Thank you for your time and cooperation in this matter. Please contact me by telephone at 303-692-6337 or by electronic mail at [michael.emming@state.co.us](mailto:michael.emming@state.co.us) if you have any questions.

Sincerely,



Digitally signed by Michael Emming  
DN: cn=Michael Emming, o=Engineering  
Section, ou=Water Quality Control Division,  
email=michael.emming@state.co.us, c=US  
Date: 2018.07.30 14:55:08 -06'00'

Michael G. Emming, P.E.  
Senior Review Engineer  
Engineering Section | Water Quality Control Division  
Colorado Department of Public Health and Environment

cc: Nicholas Marcotte, Element Engineering, LLC  
Michael Poeckes, Cherokee Metropolitan District  
Norm Steen, Pikes Peak Area Council of Governments  
Aaron Doussett, El Paso County Public Health  
Mark Gebhart, El Paso County, Development Services Department  
Bret Icenogle, WQCD ES Engineering Section Manager  
Amy Zimmerman, WQCD ES Unit Manager  
Doug Camrud, WQCD ES Unit Manager  
Mandy Mercer, WQCD CW EU Enforcement Specialist  
Site Application File | Discharge Permit File (COX048348)