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Lead Issues in Flint, Michigan

by Jennifer Robinett, drinking water compliance assurance section manager

The recent events with lead in Flint, Michigan highlighted the importance of safe drinking water for citizens across the nation. The Flint issues also brought long-needed attention to the complexity and implementation challenges with the lead and copper rule. Over the last few months, as part of a national EPA directive, the Colorado Department of Public Health and Environment has been communicating with EPA Region 8 regarding lead and copper rule implementation in Colorado. In February 2016, EPA contacted all states and encouraged them to work with EPA regarding rule implementation and to assure that public health risks associated with lead in drinking water are addressed. A copy of the EPA's letter to our Executive Director, Dr. Wolk, and our response are available online at www.colorado.gov/cdphe/wq-publications. We encourage drinking water systems to take some of the steps mentioned in Dr. Wolk's letter. Please begin utilizing the new lead and copper rule sampling guidance available on line at www.colorado.gov/pacific/cdphe/lcr.

In Colorado, approximately 1,000, or half of Colorado's 2,000 regulated public drinking water systems, are subject to the lead and copper rule. The rule does not apply to transient non-community water systems. As with all drinking water rules, water systems are required to undertake actions to comply with the rule and report to the department. Therefore, the department works in partnership with drinking water systems. EPA is currently working on substantial revisions to the lead and copper rule and continues to release additional clarification and guidance. At the national level, we anticipate that lead issues will continue to be a concern for the foreseeable future. We are closely monitoring lead-related information as it becomes available.

What should water systems do now?

- Stay tuned for more communications from us, especially about the items included in Dr. Wolk's letter and as new information becomes available.

(Continued on page 3)

Is direct potable water reuse allowed in Colorado? Part 2

by Ron Falco, P.E., Safe Drinking Water Program manager

In the winter issue of Aqua Talk I answered two key questions regarding direct potable reuse regarding legality and what regulations would need to be met today. Now, let's explore what future direct potable reuse regulations might look like.

First, we would need to define direct potable reuse. When does indirect potable reuse become direct? Where does the reclaimed water enter what is considered drinking water infrastructure? What percentage of the overall drinking water treatment flow would need to be from the reclaimed wastewater treatment plant to be considered direct potable reuse, one percent, ten percent, or fifty percent? These fundamental questions would need to be answered probably with definitions that would also allow some flexibility.

Next, we could develop a set of applicable technologies that could be considered and determine specific conditions that might apply to them. This would likely be done in a combination of regulations and policy, i.e. the drinking water design criteria. Treatment goals, recordkeeping, operations and public notice considerations would need to be incorporated into the process.

Based on recent events in the water industry we foresee that detailed evaluations of corrosivity would need to be done and impacts to the lead and copper rule addressed. At a minimum optimum corrosion control would need to be looked at, as well as water quality parameters. Also, over time, the chloride level in the drinking water might increase depending on the treatment technologies chosen. How would this effect corrosivity? We envision that a system deploying direct potable reuse would need to go on six-month monitoring for the lead and copper rule, which means that the number of sample sites is double compared to reduced monitoring.

In considering direct potable reuse, we often consider unregulated compounds. Based on results from the third unregulated contaminant monitoring rule, or UCMR3,



there has been a great deal of public interest in unregulated contaminants, including perflourinated compounds. The possible presence of PFCs in reclaimed water may need to be considered. Additionally, the list of unregulated compounds that will be tested during UCMR4 could further heighten public concerns about specific compounds on that list and unregulated compounds in general.

I still believe that the biggest challenge for direct potable reuse remains public acceptance, especially considering recent events. As I have stated in the past, we believe that all the challenges with direct potable reuse are surmountable, but given our resource constraints, the department can assist with that process, but could not take the lead.

A handwritten signature in black ink, appearing to be 'RF' or similar initials.

Lead Issues in Flint

(Continued from page 1)

- Sign up for the department's safe drinking water listserve notification. This is easy and is a great way to ensure that you receive updates when they are available. Please visit the department's website at <https://www.colorado.gov/pacific/cdphe/drinking-water-training-opportunities> to sign up.
- Find ways to effectively share lead and copper rule materials survey and related information with the public. This includes information to help people understand if their residence has a lead service line.
- Find ways to provide more information to the public regarding sample results from homes.
- In the event of an action level exceedance, complete the public education requirement as soon as possible.
- Utilize the assistive materials that we have available for public water systems, including lead and copper sampling guidance, homeowner sampling guidance and sample identification forms. These materials, including links to the EPA's rule guidance, templates and announcements, are available online at <https://www.colorado.gov/cdphe/lcr>.



Operator certification revocation

by Jackie Whelan, local assistance unit

Can I lose my certificate for system or facility violations, such as monitoring and reporting violations? Under certain extensive, systemic or excessive circumstances, yes.

It is the responsibility of the owner of the system to ensure that the system complies with applicable permits, laws and regulations. The operator in responsible charge is responsible for the operation and maintenance of the water or wastewater facility, and is required to understand the requirements of the applicable permits, laws and regulations. This is required so that the ORC makes appropriate decisions regarding the operation and maintenance of the facility.

An ORC may take on duties that are not reserved explicitly to the ORC, such as compliance monitoring and reporting. An owner may delegate these duties to anyone and some owners assign these duties to the ORC or other staff. The ORC responsibility to understand regulatory requirements is particularly important when ORCs are assigned and accept the duties of compliance monitoring and reporting to the state. If the ORC takes on these responsibilities, the operator must perform tasks in accordance with all the requirements of the applicable regulations, permits and laws.

“I didn’t know or I didn’t understand” is not an appropriate defense when extensive, systemic or excessive violations occur in these instances. If you accept the responsibility for performing the tasks or activities, you are required to know, to understand and to do them correctly. Failure to do so presents risks to public health and the environment.



The board expects a certified operator to protect public health and the environment at all times and to uphold the integrity of the water and wastewater certified operator profession and the designation as a Colorado certified water professional while acting in such capacity. Depending on the circumstances surrounding the violations and the risks to public health or the environment that result from failures, the board may take formal disciplinary action, including revocation, against one or all certificates the operator holds.



Evaluating groundwater influence

by Doug Camrud, P.E., engineering section and Nicole Graziano, P.E., drinking water compliance assurance section

Federal and state drinking water regulations require all public water systems that use surface water or groundwater under the direct influence of surface water, also known as GWUDI, to filter and disinfect drinking water to remove pathogenic organisms. GWUDI occurs when pathogenic organisms can enter a groundwater source (e.g., infiltration gallery, spring or well), because of the source's proximity to surface water and the characteristics of the aquifer. Pathogens, such as *Giardia lamblia* and *Cryptosporidium*, are often found in surface water and cause gastrointestinal illness and/or other health risks.

The Water Quality Control Division has established a robust evaluation process to evaluate groundwater sources used for drinking water to

A seasonal system is defined as a non-community water system that is not operated as a public water system on a year-round basis.

Regardless if the system remains pressurized during the off-season, the system must still complete start-up procedures.

determine if they are GWUDI. The evaluation is conducted in accordance with the department's Safe Drinking Water Program Policy Number DW-003, Determination of Groundwater Under the Direct Influence (GWUDI) of Surface Water. The department's authority for this policy is granted in Section 11.1(6) of Regulation 11 of the Colorado Primary Drinking Water Regulations, 5 CCR 1002-11, which states, in

part, that the department may require the supplier to conduct tests and monitoring as is necessary to protect public health and demonstrate compliance.

The department first identifies potential GWUDI sources through sanitary surveys or design reviews. Factors evaluated include but are not limited to:

- Type and physical condition of the source (e.g., infiltration gallery, gallery type well or spring).

- Type of aquifer where the water source is located.
- Total depth and screening interval of the source.
- Proximity of the source to the nearest surface water.

Systems may be requested to perform water quality testing and collect source water quality data including:

- Microscopic particulate analysis from the source, one in April or May, one in June or July, and one in August or September.
- Source water total coliform and *E. coli* testing, monthly April through October.
- Conductivity from the source and nearest surface water, twice weekly April through October.
- Temperature from the source and nearest surface water, twice weekly April through October.
- Aerobic spores from the source and nearest surface water, one in April or May, one in June or July, and one in August or September, concurrent with MPAs.

The department performs an objective analysis of the source's physical factors. However, if the results of the performance tests, collected field data and analysis are inconclusive, the department will act in the interest of protecting public health. The department attempts to be consistent when determining whether or not a source is GWUDI as this will have compliance, operational and financial implications for the supplier or water system. Within the past two years, the department has conducted approximately 78 GWUDI evaluations, with approximately 30 percent of evaluations showing the source to be GWUDI and 70 percent remaining with a groundwater classification.

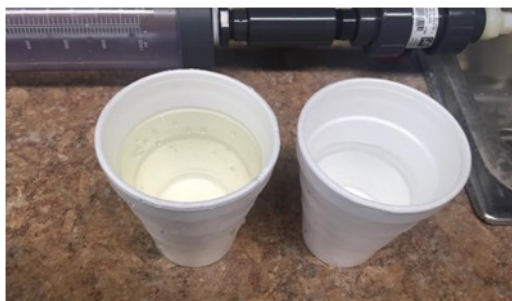
Small communities water and wastewater grant fund

by Corrina Quintana, grants and loans unit

Thirty two drinking water and wastewater systems in small communities throughout Colorado will receive a total of \$9.4 million to fund planning, design or construction of public water systems or treatment works necessary for the protection of public health and water quality. Governmental agencies, nonprofit public water systems and counties representing unincorporated areas with fewer than 5,000 people were eligible to apply for grants up to \$850,000. Funding was provided by the state legislature under Senate Bill 09-165 and SB14-025.



Small communities grant 2015 recipient, Florissant Water and Sanitation District (above) used the grant to get a new drinking water filtration system. The cup on the left is the district's water before the new equipment was installed. The cup on the right illustrates vast improvement!



Drinking water

Entity	Entity	Award Amount
Costilla	Costilla County for Garcia	\$99,816
Delta	Stucker Mesa Domestic Water Company	\$83,598
Delta	Cathedral Water Company	\$95,000
Delta	Coalby Domestic Water Company	\$72,440
Jefferson	Hidden Valley Mutual	\$840,000
Kiowa	Sheridan Lake Water	\$609,568
Mesa	Mesa Water and Sanitation	\$31,500
Otero	Patterson Valley Water	\$150,500
Otero	Fowler, Town of	\$304,355
Prowers	Bristol Water and	\$94,500
Pueblo	Boone, Town of	\$850,000
Pueblo	Rye, Town of	\$440,000
Routt	Timbers Water and	\$205,577
Teller	Forest Glen Sports	\$850,000
Weld	Wattensburg Improvement Association	\$23,146
Total		\$4,750,000

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Small communities water and wastewater grant fund

(Continued from page 6)

Wastewater projects

County	Entity	Award Amount
Archuleta	Pagosa Springs Sanitation District	\$442,765
Baca	Pritchett, Town of	\$185,000
Boulder	Nederland, Town of	\$256,500
Conejos	Manassa, Town of	\$15,000
Douglas	Louviers Water and Sanitation District	\$19,750
Grand	Hot Sulphur Springs, Town of	\$100,000
Grand	Kremmling Sanitation District	\$850,000
Huerfano	La Veta, Town of	\$850,000
Logan	Highland Park Sanitation District	\$200,000
Mesa	Mesa Water and Sanitation District	\$190,200
Moffat	Maybell Waste Water Treatment Facility	\$45,438
Morgan	Wiggins Waste Water System	\$100,000
Otero	Manzanola, Town of	\$253,328
Pueblo	Avondale Water and Sanitation District	\$596,057
Routt	Yampa, Town of	\$100,000
Saguache	Baca Grande Water and Sanitation District	\$426,150
Weld	Ault, Town of	\$88,300
	Total	\$4,718,488

Professional operator designation awards

by Jackie Whelan, local assistance unit

Congratulations to four Colorado certified operators who received professional operator designation at the Power Denver event held in conjunction with Association of Boards of Certification annual conference January 2016.

The Certification Commission for Environmental Professionals (a part of the Association of Boards of Certification) implements certification programs for water environment industry professionals internationally. Specifically, the commission functions as an independent entity to develop and administer certification in water treatment, distribution, collection and wastewater treatment operations. Commission members include water environment industry and certification subject matter experts charged with developing programs that meet the highest standards for testing and personnel certification. The commission awards certified operators their professional operator designation, the industry's first professional designation for operators. The designation signifies they met the most rigorous standards in their profession.

Each of these certification types consists of four classes of certification ranging from Class I to Class IV, with Class IV reflecting the highest level of job complexity and operational requirements. Awards are a professional designation to operators earning certification in any of the four certification types, regardless of class. The standardized exams developed for the professional operator program reflect water environment industry best practices and meet international certification standards. They are based on North American job task analyses completed by more than 2,500 certified operators and guidance from exam experts to ensure fairness, reliability and validity. To earn the title, operators must pass a certification exam and meet specific education and job experience requirements.

Why consider a professional operator?

This unique offering creates new opportunities for career advancement. The standardized certification and professional designation make skills transferable and allows for uniform recognition of professional credentials.

Join us in congratulating these Colorado certified water professionals!

Tim Meloveck, professional operator



Tim is the utility supervisor and water distribution operator in responsible charge for the Town of Carbondale. Tim holds multiple Colorado certifications in addition to his recently earned professional operator designation. Tim's certifications are all evidence of his commitment to excel in all aspects of utility operations. Before entering the water environment industry, Tim spent several years in the United States Navy as an operations specialist and in the oil and gas industry.

Ray Olson, professional operator

Ray earned a bachelor of science degree in business management from Regis University in Denver and has enjoyed a career in the water industry spanning over four decades! Ray has worked in all facets of water utility operation and

(Continued on page 9)

Operator awards

(Continued from page 8)



is currently president of TW Summit, a Colorado company specializing in rehabilitation and operations services. Ray has served the Colorado Environmental Certification and Training, Inc. distribution and collection division for 14 years, 11 of those years as chairman. Ray remains actively involved with the Association of Boards of Certification and is the association's immediate past-chair.

Craig Sheard, professional operator



Craig is the chief plant operator at the Betasso Water Treatment Facility in Boulder and has been with the City of Boulder's operations team for over 24 years. Craig holds Colorado Class A water treatment and Class 4 distribution certificates.

Craig earned a bachelor's degree in geology/ environmental studies from Antioch College and an associate's degree in water quality management technology from Red Rocks Community College.

Gabby Begeman, professional operator

Gabby is a senior facilities operator, operations manager and compliance officer for ORC Water Professionals, a Front Range based contract



operations firm with clientele throughout Colorado and Wyoming. Gabby is one of the elite few to have attained the highest level of Colorado certification in all five certificate categories. She graduated from the University of Denver in 2005 with a bachelor of science in environmental science. She also serves on the Colorado Water and Wastewater Facility Operators Certification Board.

For more information about the professional operator designation visit

www.professionaloperator.org

Field-identified violations and public notice

by Clayton Moores, P.E., field services section

All violations of Regulation 11 require public notice. As of January 1, 2016 the public notice requirements for violations identified during sanitary surveys have been included in the sanitary survey letters. The public notice requirements will also appear automatically in the draft consumer confidence report for the year following the sanitary survey for all identified violations. A small but important number of field-identified violations are more serious and require Tier 1 or Tier 2 public notices. These violations include, but are not limited to, not properly disinfecting the water and, for those required to filter, not having adequate filtration. These serious issues must be fixed as quickly as possible and the public must be notified in accordance with Regulation 11. For Tier 2 violations this typically means notice within 30 days and inclusion in the consumer confidence report.

Below are some of the more common field-identified violations and required public notice.

Sanitary surveys with field-identified violations now have an additional section included in the letter that

explains the public notice requirements and appropriate department contact for specific questions. As always, the department will assist suppliers to understand and comply with public notice requirements.

Please contact the following staff with questions:

For questions about sanitary survey activities and communication, Tyson Ingels, lead drinking water engineer, at 303-692-3002 or tyson.ingels@state.co.us.

For questions about violation tracking and public notice, Nicole Graziano, technical and regulatory implementation and coordination unit manager at 303-692-3258 or nicole.graziano@state.co.us.

You can also request free coaching assistance at the following link: <https://www.colorado.gov/cdphe/drinking-water-training-opportunities>

Violation code	Field-identified violation	Public notice requirement
T112	Inadequate ground water disinfection.	Tier 2
T120	Inadequate filtration (surface water or GWUDI).	Tier 2
D210/D220	Raw water taps for consumption or raw water bypass piping.	Tier 2
R525	Not properly monitoring residual disinfection concentrations.	Tier 2
R529	Not properly monitoring turbidity.	Tier 3
R531/R532	Not properly operating/calibrating monitoring equipment.	Tier 3
R540	Construction without approval.	Tier 3
R520	Not properly maintaining records.	Tier 3
R510	Inadequate general monitoring plan.	Tier 3
M610	No written cross connection control plan.	Tier 3

*Not all violations are included in this list. For complete details of Regulation 11 requirements, please visit <https://www.colorado.gov/cdphe/water-quality-control-commission-regulations>

Drinking water week

by Kaitlyn Minich, local assistance unit

For over 30 years, the American Water Works Association has been celebrating drinking water week. The association has a long history of partnering with government entities and other water organizations. The goal of drinking water week is to increase public awareness and involvement in public and private drinking water issues, and the American Water Works Association and its partners have created many educational campaigns surrounding this week.

While AWWA promotes the national drinking water week, here in Colorado, the department hopes to bring attention to a variety of issues of interest here. CDPHE, in partnership with Denver Water, Denver Public Libraries, the Governor's office, Metro State University among others, is creating a Colorado drinking water week to promote education and conversation around local and global drinking water issues.

We all know that Colorado has a unique relationship to water. We're one of two states where water flows out of its borders, but doesn't flow in (Hawaii is the other). We're also one of the top ten driest states in America, but serve as the headwaters for a large portion of the southwestern United States. Further, most of the state's population resides on the Front Range, while most of the water exists on the Western Slope. All these factors make Colorado's relationship to water incredibly complex and interesting.

To fully understand our unique relationship to water, we need to understand the relationship that other parts of the country and other parts of the world have with water. The media has extensively covered the lead issues in Flint, Michigan, but do

you know what protections we have in place in Colorado to reduce the likelihood of lead in our drinking water? Most of the people who read this article are familiar with water sources, treatment and distribution systems, but does the mainstream public have any idea where their water comes from and how it's treated and distributed to their homes? Colorado Drinking Water Week, May 1 through 7, 2016 provided information through a couple of events.

Tuesday, May 3 at 6 pm: Denver Public Libraries, Central Library hosted a panel of speakers to discuss local and global drinking water issues, such as lead and copper, fluoride, Colorado water law and perceptions of tap water in Denver's Westwood neighborhood.

- Denver Water
- Colorado Department of Public Health and Environment
- Westwood Unidos
- Metro State University, One World One Water

Thursday, May 5 at 7 pm: A free screening of the movie Flow at the Esquire movie Theater, was hosted by CDPHE.

Did you or your utilities doing anything to celebrate drinking water week?

Contact Kaitlyn Minich at kaitlyn.minich@state.co.us or 303-691-4084 to get recognized from department!



Gold tier system

by Kaitlyn Minich, local assistance unit

We would like to congratulate the Town of Castle Rock for achieving the gold tier in the pursuing excellence program. This program recognizes systems that go above and beyond regulatory compliance and helps systems collaborate and learn from each other. Having a system as advanced as Castle Rock in the program provides significant incentives for other systems to join, as they will have access to Castle Rock's source water protection measures, treatment goals and distribution components. Improvements to the system include:



- The town submitted information on new billing processes that saved the utility approximately \$50,000;
- Provided information on static mixers that minimizes the degradation of residual disinfectant and lowers the potential to form disinfection byproducts; and
- Submitted an energy management plan that has reduced their energy use by approximately 1.6 million kWh.

The town's population has grown dramatically in recent years and the utility has responded to these challenges and installed significant improvements. The Town of Castle Rock is truly committed to providing high quality water to their customers and committed to sharing best practices and advancing water technologies across the state. We are incredibly pleased to have them as a gold tier member in the pursuing excellence program.

Excellence program funds available

by Kaitlyn Minich, local assistance unit

Are you a small system in need of funds? The pursuing excellence program has grant money! This capital improvement grant pilot program offers grants up to \$25,000 for systems that achieve gold tier status in the program. To qualify for these funds, a system must have 5,000 or fewer residents and a median household income of 80 percent or less of the statewide median household income of \$58,433. Grants will be awarded on a first-come-first serve basis for gold tier status systems. Please note, reaching gold tier status in the pursuing excellence program takes work and documentation. Free coaching is available to help.

MORE INFORMATION

online
www.colorado.gov/cdphe/wqcd
email
kaitlyn.minich@state.co.us
phone
303-691-4084

Ask Aqua Man

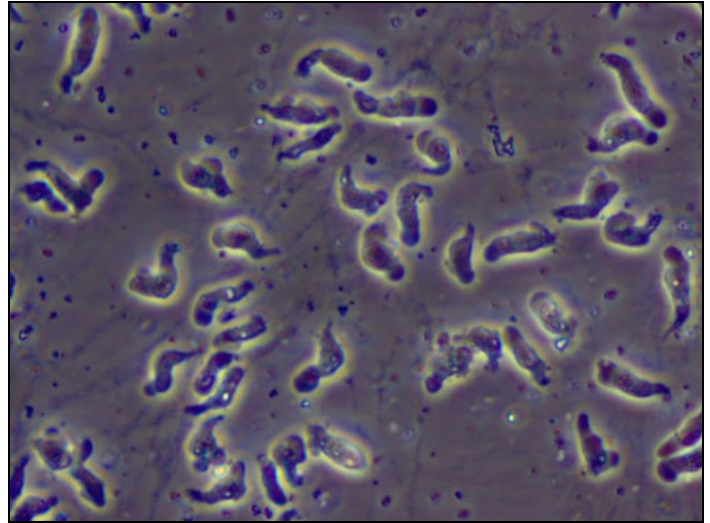
I read with interest and concern the article on the brain eating amoeba, fall 2015 Aqua Talk. In addition to neti pot users, can the amoeba live in humidifiers and be spread in the air circulated via the humidifier?

Thank you for your service,

Concerned Consumer

Dear Concerned,

Per the Center for Disease Control, *Naegleria fowleri*, the brain eating amoeba, has not been shown to spread via water vapor or aerosol droplets such as shower mist or vapor generated from a humidifier. The amoeba has never been shown to have spread from one person to another.



A wet mount of *Naegleria fowleri* trophozoites cultured from the CSF of a patient with primary amebic meningoencephalitis (PAM) viewed using phase contrast microscopy. Magnification: 600x.

Your turn: Ask Aqua Man

Have some time saving helpful hints or tips to share with fellow operators? Can Aqua Man answer your question? Is there a topic you would like discussed?

- ◆ email: cdphe.wqdwtraining@state.co.us
- ◆ phone: 303-692-3665
- ◆ fax: 303-782-0390
- ◆ mail: WQCD, 4300 Cherry Creek Drive South, Denver, CO 80247

Testing your knowledge

Think you know everything about drinking water! Prove your drinking water knowledge with our interactive quiz. Please go [online](#) to record your answers. Answers will appear in the next issue. Enjoy!



1. How much money was awarded from the small communities water and wastewater grant fund?
 - A. \$15.3 million
 - B. \$12.6 million
 - C. \$9.4 million
 - D. \$6.9 million
2. How many Colorado regulated public water systems are subject to the lead and copper rule.
 - A. 2,000
 - B. 1,500
 - C. 1,000
 - D. 1,200
3. The owner is responsible to ensure system compliance with applicable permits, laws and regulations?
 - A. True
 - B. False
4. The goal of drinking water week is to increase public awareness and involvement in drinking water issues.
 - A. True
 - B. False
5. What is the best way to stay informed about drinking water issues?
 - A. Visit the Water Quality Control Division website at www.colorado.gov/cdphe/wqcd
 - B. Sign-up for the drinking water listserv.
 - C. All of the above.
 - D. None of the above.

Answers to winter 2016 drinking water quiz.

1. Where did the WARN entity originate? *B. California.*
2. What are some of the benefits of aquifer storage and recovery? *D. All of the above.*
3. Revolving fund projects are required to submit final plans, technical specification and contract documents. *A. True.*
4. What is the minimum disinfectant residual for water haulers? *B. 0.20 mg/L.*
5. There are regulatory definitions for indirect and direct reuse: *B. False.*
6. What year was legislation passed mandating certified operators for water and wastewater treatment facilities? *C. 1973*
Private nonprofit entities are eligible to apply methods to minimize lead and copper. *A. True*

Resources and more information

Visit us on the web

Follow safe drinking water program on Twitter!

twitter.com/WQCD_Colorado

The Water Quality Control Division's home page web address is

www.colorado.gov/cdphe/wqcd

For training opportunities, please visit the division's website at

www.colorado.gov/cdphe/dwtraining.com

To access Aqua Talk online, go to

www.colorado.gov/cdphe/aquatalk.com

To access inspection services go to:

www.colorado.gov/cdphe/wqinspectionsservices

To access the contact list for drinking water regulations go to:

www.colorado.gov/cdphe/wqcd

Aqua Talk

Newsletter Information

Editorial team: Ron Falco, Jacki Main, Kaitlyn Minich, Doug Camrud, Armando Herald, Kelly Jacques, Corrina Quintana, Nicole Graziano and Jackie Whelan.

We welcome comments, questions, story ideas, articles and photographs submitted for publication. Please address correspondence to Jacki Main, Aqua Talk Newsletter, Water Quality Control Division, 4300 Cherry Creek Dr. S., B2, Denver, CO 80246,1530 or email cdphe.wqdwtraining@state.co.us. Enter "Safe Drinking Water Newsletter" as the subject. Past issues are available by contacting the editor or visiting the website at: www.colorado.gov/cdphe/aquatalk.com

UNSUBSCRIBE: if you would like to stop receiving this newsletter, please contact us at 303-692-3665.



COLORADO

Water Quality Control Division

Department of Public Health & Environment



Safe Drinking Water Program
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WQCD DRINKING WATER PROG, 2030

Aqua Talk



A quarterly newsletter published by the
Safe Drinking Water Program, Water Quality Control Division,
Colorado Department of Public Health and Environment
4300 Cherry Creek Dr. S., Denver, CO 80246, 1530

303-692-3500

www.colorado.gov/cdphe/wqcd

DATE OF ISSUE: SPRING 2016

Editor: Jacki Main

Purpose: to communicate division drinking water-related issues to stakeholders.