

Littleton/Englewood WWTP







NPDES Permit Renewal

- NPDES permits required based on Clean Water Act
- Water Quality Control Division issues and enforces permit
- Permit sets limits based on:
 - Implementation of technology
 - Protection of stream uses (e.g., recreation, drinking water, aquatic life)
- Permit has limits for metals, ammonia, nutrients, bacteria, and temperature







NPDES Permit Renewal

- In public permit review process
- Extended comment period from 30 to 60 days
- Comments due Sept 22nd





Action Item: Nutrients

- New state requirement for nitrogen and phosphorus limits
- Focus on phosphorus treatment
- Requires study, design, and construction
- Requesting 5 years to complete the project









Action Item: Total Inorganic Nitrogen

- More stringent daily limits
- Requires study, design, and construction
- Requesting alternate calculation method
- Requesting extended compliance schedule









Action Item: Temperature

- Successful in delaying and reducing temperature requirements
- Permit limits for summer months
- Requires additional study
- More difficult limitations are delayed until 2031









Action Item: Local Limits

- Evaluate possible new local limits based on the new permit limitations
- May result in more stringent limits applied to industries discharging to LE
- Requires evaluation
- Requesting more time









New State Practices

Reserve Capacity

- New concept being applied to LE's permit
- Added 10% to capacity for future growth
- No authority to add reserve capacity
- Requesting to remove reserve capacity

Tiers

- Allows for higher limits at lower flows
- Has been applied in previous permit
- Requesting to keep tiers





Additional Changes to Permit Conditions

Constituent	Change	Request
Copper	Lower limit	New rationale
Ammonia	Slightly lower limits	None
Uranium	New limit	No monitoring
Chlorine	New averaging period	Monthly limit
Toxicity	New growth/ reproduction limits	None





Positive Results

- Fewer parameters to monitor
- Reporting requirements instead of numeric limits for several parameters
- Several monitoring frequencies reduced
- Main temperature requirements not effective until 2031
- Additional nitrate removal not required now







Next Steps

- Comments on permit due September 22nd
- State will provide response to comments
- Will come back to Councils with final results







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