

River Glen Homeowners' Association

PO Box 1251

Berthoud, CO 80513

Audit Response

20.June.2013

Colorado Dept of Public Health and Environment (CDPHE)
Field Services Section
Attn: Christine Lukasik
4300 Cherry Creek Drive, South
Denver, CO 80246-1530

Subject: Official response to audit, permit number CO-0029742, audit performed 02.may.2013, audit report dated 29.may.2013

Dear Christine,

Thank you for your patience with us during audit of our facility called "Riverglen" back on 02.may. Thank you also for the well-detailed list of improvement suggestions in your audit report. This list will surely help us to improve our compliance, as well as improve the performance of our system. Itemized replies below, numbered symmetrically with the numbering in your report.

Alleged Violation 1: Compliance schedule

- We believe that RGHOA has indeed met the milestones of the compliance schedule. Sadly, we were unable to provide adequate documentation on the audit date to prove this claim.
- As requested, signed copy of the 15.february letter is included here as detailed in your report.
- Additionally, we have asked Bret Icenogle at state office to search for copy of the second letter (milestone requirement 31.dec.2012), but as of this date, Bret has not replied.
- Additionally, we have provided here a letter from our primary contact at Larimer County office, attesting to our compliance with the required milestones.
- See attachment number 1 (X pages total)

Alleged Violation 2: Biosolids practices

- I have communicated with Tim Larson, and submitted to Tim an ex-post-facto report for 2010 and for 2011. Copies of all three years are attached here for your review
- We have established a file folder at our facility specifically for keeping paper copies of all biosolids reports, currently five years on file
- See attachment number 2 (X pages total)

Alleged Violation 3: Data inaccurate on DMRs

- We have collected DMRs from state office for first quarter of 2011, and for second quarter of 2013 as requested.
- We have initiated communication with the two laboratories with whom Riverglen has done business since 2011, and requested laboratory results for the two quarters in question.
- We request more time to complete our necessary actions for this alleged violation. Specifically, we request your flexibility to permit us to resolve this item no later than 15.August.2013

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Alleged Violation 4a: Flowmeters not properly calibrated

- We have scheduled a visit from a flow-measurement expert to provide third-party calibration of both of our palmer-bowlus systems. Once complete, we will provide calibration reports for both units.
- We have asked our calibration provider to also review position of the secondary measuring device (the ultrasonic xducer) with respect to the D/2 location requirement. The conclusions from that assessment will also be noted on the calibration report.
- We request more time to complete our necessary actions for this alleged violation. Specifically, we request your flexibility to permit us to resolve this item no later than 15.August.2013

Alleged Violation 4b: Handheld devices not properly calibrated

- We do indeed have three handheld testing devices which could be calibrated. Those are:
 - Dissolved oxygen meter, model YSI 550A
 - Colorimeter, Hach model II
 - pH meter, Hach model Sension 2
- We will take steps to have these devices calibrated, but without disruption to our normal operation (we cannot currently ship these away, because we have no replacement)
- We request more time to complete our necessary actions for this alleged violation. Specifically, we request your flexibility to permit us to resolve this item no later than 15.August.2013

Alleged Violation 4c: Aerator not functional

- We have repaired our aerator in lagoon number 2, by purchasing an identical motor of the identical model. This is a repair, not a new aerator, and it is the same model that has been in operation at our facility since original site location approval. Both aerators have now been functioning reliably since approximately 25.may.2013
- See attachment number 4c (X pages total)

Alleged Violation 5: Failure to maintain records

- Our previous operator left us no data in the way of daily log sheets, COCs, lab results, etc
- We have established a filing system at our facility to keep paper records of all DMRs, and currently have all DMRs available for the past three years at our facility.
- We have established filing folders for equipment calibration records, including but not limited to influent and effluent flow measurement devices.
- Our new operator (Bob) brings to our facility a long history of much improved practices and habits for maintaining log sheets detailing activities from each day's visit.
- Attached photos show some excerpts from the log-book that Bob has been maintaining since he took over as ORC for our facility. Also attached are photos of our improved filing system for other types of records. We are lucky to have Bob's help and broad experience.
- See attachment number 5 (X pages total)

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Tabular Summary:

Alleged Violation Number	Attachment Number	Does Riverglen currently plan additional actions?
1	1	No – we request you consider to close
2	2	No – we request you consider to close
3		Yes – we request extension until 31.July
4a		Yes – we request extension until 31.July
4b	4b	No – we request you consider to close
4c	4c	No – we request you consider to close
5	5	No – we request you consider to close



Michael Dower
Primary Contact
Riverglen homeowner and sewer chairman



Bob Airhart
ORC