

March 11, 2022

TO: Deike Estates Special Improvement District Property Owners

RE: Sewer Connectors System Assessment Requirements

### **ACTION REQUIRED!**

The Deike Estates Special Improvement District (the “District”) provides water and sewer service to the business properties in Deike Estates. The Wyoming Department of Environmental Quality (WYDEQ) Water Quality Division (WQD) has issued to the District a Notice of Violation (NOV) for exceeding the permit limit for nitrate in the wastewater system monitoring well. There are no known issues with the health and safety of the potable water provided by the water system, and water and wastewater service to Deike Estates’ properties will continue. However, the District must take action to address this permit limit exceedance.

The WYDEQ considers failure to comply with regulatory requirements as a serious matter with potential legal enforcement action including the potential for monetary fines.

The District has engaged CGRS to investigate and correspond with the WYDEQ in an effort to address the sewer system violations. CGRS is a full-service engineering, construction, compliance, and environmental consulting company with 30 years of experience providing design, compliance, assessment, construction, and remediation services. Our experienced staff includes engineers, geologists, hydrogeologists, field technicians, and support staff. By integrating experience from all of our departments we are able to design and implement systems that meet and exceed client and industry standards.

Domestic wastewater from sewer connectors currently is injected through a septic system into the Ogallala aquifer beneath the facility. Groundwater sampling has shown consistent exceedances of nitrate. Initial system assessment has generated more questions than answers regarding the source and cause of these nitrate deficiencies. Currently, the WYDEQ is requesting assessment and certification of compliance of individual connector systems including whether or not individual connectors have pretreatment or filtration, and whether/how they are connected to the Deike Estates septic system.

Of particular concern is routing of floor drains from any facility where “repair work is done on machinery of any description.” The existence of floor drains in automotive or machinery repair areas that discharge to groundwater is a violation of Wyoming Water Quality Rules Chapter 27 (April 14, 1998). Any related tanks, sumps, and/or sand/oil interceptors cannot discharge to the sewage collection system. If such systems exist, they require permitting by the Wyoming Water & Wastewater Program. If such systems are connected to the sewage collection system, those connections will be ordered for immediate and permanent plugging and closure.

In an effort to address the NOV and document the overall collection system configuration, the District requires each property owner’s assistance in this investigation and assessment. Each property owner

shall provide to the District a complete assessment surveying of their sewer connection and provide documentation to include the following:

- As-Built diagrams and other documentation of their sewage collection system including and detailing:
  - Video/Camera evidence of service pipeline condition from connection at the main to the nearest accessible point at/near the foundation line.
  - Pipe sizes, routing, and configuration
    - from inside each facility fixture to the point of connection with the sewer main or manhole
  - Floor drains, trench drains, and similar points of entry
  - Facility points of connection, fixture counts, and fixture types
  - Cleanouts
  - Pretreatment facilities (*i.e.*, grease traps, sand/oil interceptors, sumps, etc.)
    - Include documentation of maintenance pumping frequency and history in the preceding 12-month period (dated bills of lading, pump out receipts, etc.)
    - Include documentation/description of size, configuration, and proof of watertightness
    - Include basis for sizing
  - Lift station or pumping equipment and force mains
- Certification of above by a Professional Engineer registered in the State of Wyoming

By no later than April 5, 2022, the District requests submittal of each connector's plan of action including the firm to perform the assessment and the timing for completion. Your submittal will be reviewed by the District Board during the April 14<sup>th</sup> Board Meeting. Should connectors fail to respond, the District will engage a qualified firm to proceed with individual connector assessments and assess such costs to each connector's account.

If you would like to participate in a District-led effort for assessment and/or camera work, please relay your interest and the portion of the assessment you would like completed by the District's selected contractor. Costs will be assessed to individual connectors for their portion of the assessment, but we believe utilizing a single contractor will result in overall savings to participants by reducing mobilization costs.

If you have any questions or would like additional information, please contact Greg Steed with CGRS Inc. at [gsteed@cgrs.com](mailto:gsteed@cgrs.com) or (800) 288-2657.

Regards,

**Deike Estates Special Improvement District Board of Directors**

cc: Sue Blair, Community Resource Services  
Posted: [www.desid.specialdistrict.org](http://www.desid.specialdistrict.org)