



Della Cox-Vieira <dcoxvieira@alamosacounty.org>

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## Fwd: Colorado Public Radio: Public Health variance story

4 messages

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Jordan Kemp <jkemp@alamosacounty.org>

Wed, May 27, 2020 at 11:15 AM

To: Gigi Dennis <gdennis@alamosacounty.org>

Cc: Della Cox-Vieira <dcoxvieira@alamosacounty.org>

Gigi,

Please see below for a request for a phone interview from Colorado Public Radio regarding the variance request. Della and I thought that you or the Commissioners might want this chance to put out some talking points, so we wanted to forward the request along. Lyndsay can be reached at 404-819-0089.

Let me know if you would like us to do something different with this request.

Thanks,

Jordan Kemp

----- Forwarded message -----

From: **Lindsay Fendt** <lindsayfendt@gmail.com>

Date: Wed, May 27, 2020 at 11:01 AM

Subject: Re: Colorado Public Radio: Public Health variance story

To: Jordan Kemp <jkemp@alamosacounty.org>

Hi Jordan,

Thanks for this. I was actually hoping to have a brief phone interview with you if possible. I have a few questions about what agricultural outbreaks there are (it only shows one on the outbreak list), how the denial is affecting the community and what the county plans to do going forward. It would be great to record this, possibly to go on the radio, but I could also just use the conversation for a written story.

Let me know if you would be available for a call later today.

Thanks for your time,

Lindsay Fendt

On Wed, May 27, 2020 at 10:54 AM Jordan Kemp <jkemp@alamosacounty.org> wrote:

This message was sent securely using Zix®

Lindsay,

Please see attached for a press release from the County of Alamosa related to our variance request. A full copy of the letter we received from CDPHE can also be viewed at <https://alamosacounty.colorado.gov/news-article/county-commissioners-respond-to-cdphe-variance-denial>.

Please let me know if you have any further questions. Email is usually the best way to reach me.

Thank you for your time,

Jordan Kemp

On Wed, May 27, 2020 at 10:49 AM Lindsay Fendt <lindsayfendt@gmail.com> wrote:

Hi Jordan,



Alamosa County Public Health Department  
8900 Independence Way, Suite #B  
Alamosa, CO 81101  
Phone: 719-589-6639  
Fax: 719-589-1103  
Web: [www.slvhomehealth.com](http://www.slvhomehealth.com)

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**Gigi Dennis** <[gdennis@alamosacounty.org](mailto:gdennis@alamosacounty.org)>  
To: Jordan Kemp <[jkemp@alamosacounty.org](mailto:jkemp@alamosacounty.org)>  
Cc: Della Cox-Vieira <[dcoxvieira@alamosacounty.org](mailto:dcoxvieira@alamosacounty.org)>

Wed, May 27, 2020 at 11:51 AM

Thanks Jordan. Commissioner Allen will do the interview. If you have a few talking points, especially around the Mushroom Farm, it would be very helpful. Do we contact Lindsey on a time or will you set it up?

Thank you



Gigi Dennis  
County Administrator  
  
8900 A Independence Way  
Alamosa, CO 81101  
719-587-5169 (d)  
719-580-8820 (c)

[Quoted text hidden]

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**Jordan Kemp** <[jkemp@alamosacounty.org](mailto:jkemp@alamosacounty.org)>  
To: Gigi Dennis <[gdennis@alamosacounty.org](mailto:gdennis@alamosacounty.org)>  
Cc: Della Cox-Vieira <[dcoxvieira@alamosacounty.org](mailto:dcoxvieira@alamosacounty.org)>

Wed, May 27, 2020 at 12:16 PM

Gigi,

I don't know Commissioner Allen's schedule so it's probably best if you contact Lindsey directly on the time. I can have some talking points to you shortly.

Thanks,

Jordan Kemp  
[Quoted text hidden]

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**Gigi Dennis** <[gdennis@alamosacounty.org](mailto:gdennis@alamosacounty.org)>  
To: Jordan Kemp <[jkemp@alamosacounty.org](mailto:jkemp@alamosacounty.org)>

Wed, May 27, 2020 at 12:32 PM



Della Cox-Vieira <dcoxvieira@alamosacounty.org>

## Colorado Public Radio Talking Points

1 message

Jordan Kemp <jkemp@alamosacounty.org>

Wed, May 27, 2020 at 12:29 PM

To: Gigi Dennis <gdennis@alamosacounty.org>, Darius Allen <dallen@alamosacounty.org>

Cc: Della Cox-Vieira <dcoxvieira@alamosacounty.org>

Gigi and Commissioner Allen,

Here are a couple of talking points related to the outbreak at the Mushroom Farm for the interview with Colorado Public Radio.

1. The only agricultural facility outbreak currently in the County of Alamosa occurred at the Colorado Mushroom Farm.
2. The Colorado Mushroom Farm has worked closely with the Alamosa County Public Health Department to maximize safety of their workforce and product. Due to the cleaning and safety requirements put into practice by the facility, the County Public Health Department was advised by the Colorado Department of Public Health and Environment that no closure of the facility was needed to ensure safety of the workforce and product.

Let me know if you have further questions.

Thank you,

Jordan Kemp

—  
**Jordan Kemp, MHA**  
Deputy Director of Public Health  
Alamosa County Public Health Department  
(he, him, his)



Alamosa County Public Health Department  
8900 Independence Way, Suite #B  
Alamosa, CO 81101  
Phone: **719-589-6639**  
Fax: **719-589-1103**  
Web: [www.slvhomehealth.com](http://www.slvhomehealth.com)

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Della Cox-Vieira <dcoxvieira@alamosacounty.org>

## Letter

3 messages

Stephanie Duncan <skduncan@alamosacounty.org>

Thu, May 28, 2020 at 8:57 AM

To: Della Cox-Vieira <dcoxvieira@alamosacounty.org>, Beverly Strnad <bstrnad@alamosacounty.org>

Good morning! I just had a kiddo and his Mom come in for a letter so that she can return to work at the mushroom farm. Her name is [REDACTED] her phone is [REDACTED]

I told him I would have someone call Mom and that if we could issue a letter they could pick it up later today.

I can gladly print the letter if she is able to return to work, just let me know.

Thanks!



Stephanie Duncan  
Administrative Assistant  
Alamosa County Public Health Department  
8900-B Independence Way  
Alamosa, CO 81101  
P)719-589-6639  
F)719-589-1103

Beverly Strnad <bstrnad@alamosacounty.org>

Thu, May 28, 2020 at 9:14 AM

To: Stephanie Duncan <skduncan@alamosacounty.org>

Cc: Della Cox-Vieira <dcoxvieira@alamosacounty.org>

I left it with Deanna yesterday morning (' cause they were going to pick it up yesterday!) so it should be there somewhere, but in case you can't find it, here it is again.

Beverly Strnad, RN  
Public Health Nurse  
Alamosa County Public Health Dept.  
Phone: (direct line) 719 587-5187  
Fax: 719 589-1103

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[Quoted text hidden]

 [REDACTED] Isolation or Quarantine Complete Letter.doc

363K



May 8, 2020

To whom it may concern,

\_\_\_\_\_ does not have to quarantine or isolate at this time.

Della Cox Vieira, RN, MPH  
Public Health Director  
Alamosa County Public Health Department  
8900 Independence Way, Suite B  
Alamosa, CO 81101  
(719 ) 589-6639  
fax (719) 589-1103



Della Cox-Vieira <dcoxvieira@alamosacounty.org>

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## Letter request

2 messages

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**Kerrie Harris** <kharris@alamosacounty.org>  
To: Della Cox-Vieira <dcoxvieira@alamosacounty.org>

Thu, Jun 4, 2020 at 6:03 PM

Hello Mrs. Della,

One of our Mushroom Farm Families missed an immigration appointment due to illness and being in isolation due to Covid 19 positive test results. They need a letter and the one I found in the drive is in spanish do you happen to have an english copy of it? I already have copies of their end of isolation letters and copies of their lab results. We are going to have them each sign a records release for the lab result copies.

--  
In Health,

Kerrie Lynn Harris, BSN, HNB-BC, CYN, RN  
Public Health Nurse  
HCP Care Coordinator  
Alamosa County Public Health Department  
Phone: (719) 587-5184

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 **Isolation Letter-sp (1).doc**  
363K

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**Della Cox-Vieira** <dcoxvieira@alamosacounty.org>  
To: Kerrie Harris <kharris@alamosacounty.org>

Fri, Jun 5, 2020 at 2:05 PM

Kerrie:

Bev has the English version. Sorry I didn't save it to my H:// drive.

**Della Vieira, RN, MPH**

**Director**

she, her, hers



Alamosa County Public Health Department  
8900 Independence Way, Suite B  
Alamosa, CO 81101  
(719 ) 589-6639  
fax (719) 589-1103





Della Cox-Vieira <dcoxvieira@alamosacounty.org>

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**URGENT - Fwd: Mitel voice message from GURULE ERNEST, +17202534077 for mailbox 2509**

6 messages

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**Heather Brooks** <hbrooks@ci.alamosa.co.us>

Fri, Jun 12, 2020 at 10:50 AM

To: Della Cox-Vieira <dcoxvieira@alamosacounty.org>, Kevin Wilkins <kwilkins@slvdr.org>, Kathy Woods <kwoods@ci.alamosa.co.us>

Hey there,

This is a reporter out of Pueblo, I think. He's a nice guy and I've worked with him on some of his previous stories. I called him back from his message below related to an "economic development question" and he is doing a story on COVID-19 and the Mushroom Farm. His first question was prefaced that he heard the farm was closed down because of the virus. I knew we had an outbreak there, but I guess I missed that it was closed down. Once I knew what the story was on, I told him that I could not speak intelligently on this topic and that I would pass his information on to those who could.

Della, can you or someone from your office call him back to answer any questions related to COVID-19?

Kevin or Kathy, can you call him back on the economic impact related to the mushroom farm. I don't know how many they employ and what that impact is.

His deadline is today. Ernest Gurule, 720-253-4077

Thanks,

Heather

----- Forwarded message -----

From: **Desiree Cortez** <dcortez@ci.alamosa.co.us>

Date: Fri, Jun 12, 2020 at 10:04 AM

Subject: Fwd: Mitel voice message from GURULE ERNEST, +17202534077 for mailbox 2509

To: Heather Brooks <hbrooks@ci.alamosa.co.us>

Ernest Gurule would like to speak with you about an economic story in Alamosa.

----- Forwarded message -----

From: **Mitel Voice Mail** <helpdesk@ci.alamosa.co.us>

Date: Fri, Jun 12, 2020 at 9:51 AM

Subject: Mitel voice message from GURULE ERNEST, +17202534077 for mailbox 2509

To: <dcortez@ci.alamosa.co.us>

You have received a voice mail message from GURULE ERNEST, +17202534077 for mailbox 2509.  
Message length is 00:00:33. Message size is 262 KB.

--  
Desiree Cortez

Administrative/ Legal Assistant

City of Alamosa | 300 Hunt Ave. | Alamosa, CO 81101

P: (719) 587-2509 | F: (719) 589-9454





**Della Cox-Vieira** <dcoxvieira@alamosacounty.org>

Fri, Jun 12, 2020 at 10:58 AM

To: Kay Crowder <kcrowder@alamosacounty.org>, Linda Smith <lsmith@alamosacounty.org>

I believe our piece of this is COVID questions. Can one of you take it, or should I ask Jordan to call him?

**Della Vieira, RN, MPH**

**Director**

she, her, hers



Alamosa County Public Health Department

8900 Independence Way, Suite B

Alamosa, CO 81101

(719) 589-6639

fax (719) 589-1103



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**Linda Smith** <lsmith@alamosacounty.org>

Fri, Jun 12, 2020 at 11:14 AM

To: Della Cox-Vieira <dcoxvieira@alamosacounty.org>

Cc: Kay Crowder <kcrowder@alamosacounty.org>

I can call him back for general COVID questions. If I can't answer what he needs I'll get in touch with Jordan.

**Linda Smith, SLV EPR Coordinator**

San Luis Valley Public Health Partnership

Emergency Preparedness & Response

Cell (719) 580-6779, Office (719) 587-5199

Email lsmith@alamosacounty.org

www.slvphp.com

www.slvemergency.org

sbe/ber/hers



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Della Cox-Vieira <dcoxvieira@alamosacounty.org>

## Request for Information - Rakhra Mushroom Farm - Arsenic Treatment System

1 message

WQEngReview - CDPHE, CDPHE <cdphe.wqengreview@state.co.us>

Fri, Jun 12, 2020 at 4:50 PM

To: idclair1954@gmail.com

Cc: tallestman56@gmail.com, Della Cox-Vieira <dcoxvieira@alamosacounty.org>, Douglas Camrud - CDPHE <douglas.camrud@state.co.us>, Anthony Kerr - CDPHE <anthony.kerr@state.co.us>, CDPHE WQEngReview - CDPHE <cdphe.wqengreview@state.co.us>

Please see attached for your electronic copy of the above-referenced document. Please contact the signer of the document regarding any question of issues with the content of the letter. If there are any issues with opening the attachment, please do not hesitate to contact me.

\* The attached document is CDPHE official correspondence to you in electronic format. You will not be receiving a hard copy of his document.

\*\* The Engineering Section is interested in gaining feedback about your experience during the engineering review process. We would appreciate your time to complete a Quality-of-Service Survey regarding your experience during the engineering review process leading up to the issuance of this decision letter. The Engineering Section will use your responses and comments to identify strengths, target areas of improvement, and evaluate process improvements to better serve your needs. Please take a moment to fill out our survey at the following website:

<http://fs8.formsite.com/cohealth/form627710151/index.html>

James Alcorn  
Program Assistant  
Engineering Section



M 303.692.3539 | F 303.782.0390  
4300 Cherry Creek Drive South, Denver, CO 80246  
[jamesa.alcorn@state.co.us](mailto:jamesa.alcorn@state.co.us) | [www.colorado.gov/pacific/cdphe](http://www.colorado.gov/pacific/cdphe)

24-hr Environmental Release/Incident Report Line: 1-877-518-5608



CO0202666 \$ Basis of Design - Request for Information \$ 6-12-2020 \$ A \$ ES.18.DWDR.04562.pdf

124K

June 12, 2020

Don Clair / Administrative Contact  
Rakhra Mushroom Farm  
10719 County Road 5 S.  
Alamosa, CO 81101

Subject: Second Request for Information; Drinking Water Plan Submittal  
Arsenic Treatment System, Rakhra Mushroom Farm  
Public Water System Identification (PWSID) No. CO0202666, Alamosa County  
Enforcement Order No. DW.05.18.202666, ES Project No. ES.18.DWDR.04562

Dear Mr. Clair:

The Colorado Department of Public Health and Environment (Department), Water Quality Control Division has received and reviewed the plans and specifications submittal dated September 28, 2018 for the Rakhra Mushroom Farm Arsenic Treatment System. Additionally, the Department has received and reviewed the additional information (revised submittal) e-mailed June 4, 2020 by The Source H2O. These reviews have been performed in accordance with Section 11.4(1)(b) of the *Colorado Primary Drinking Water Regulations* (Regulation 11). The proposed public water system design does not meet the requirements of the *State of Colorado Design Criteria for Potable Water Systems* (Design Criteria) and cannot be approved at this time (e.g., Item 10 below notes that the process flow diagram indicates chlorine injection prior to the ion exchange system, which is not recommended by the resin manufacturer as chlorine degrades the resin). The review process for this project has been placed on hold pending resolution of the following issues. For clarity, the numbering system for these issues follows the number system in the Department's initial January 16, 2019 request for additional information letter, and identifies the items that were sufficiently addressed or remain unresolved at this time.

1. According to Section 1.2.3(b) of the Design Criteria, Table 1.2, line (xv), design submittals for all waterworks projects that impact treatment must include water quality results depending on the proposed or installed treatment processes. For anion exchange modifications or additions to existing processes, other than nitrate removal, the design submittal must include water quality results for:
  - a. pH
  - b. Temperature
  - c. Alkalinity
  - d. Sulfate
  - e. Chloride
  - f. Any competing anions

The supplier has provided water quality data through the Department's drinking water portal for arsenic, nitrate, organics and some inorganics, but the supplier does not appear to have provided alkalinity, sulfate, chloride, or data for competing ions specific to the proposed resin. Per Table 1.2 and Table 1.3 of the Design Criteria, please provide two water quality data results, from different calendar months, that includes the above listed analytes.

2. According to Section 1.2.4 of the Design Criteria, the process flow diagram must show all major liquid and solids flow paths through various unit processes and include proposed sampling locations and bypasses. Also, it must show chemical feed locations, flow metering and control locations. The revised



flow diagram identifies sodium hypochlorite injection and a contact tank prior to two non-regenerating ion exchange columns. The flow diagram does not appear to include the installed process equipment including well, storage tank and transfer pumps. Please revise the flow diagram to show all proposed and installed process equipment, flow paths, sample locations, metering and controls.

3. According to Section 1.2.5 of the Design Criteria, treatment related capacity and design calculations for the addition of new treatment processes to an existing treatment plant, must be submitted per paragraph (b), lines (i) thru (v). The revised submittal provides three arsenic removal projections based on different operating pHs. The submittal does not appear to include details related to the installed treatment system, treatment goals, equipment design parameters or supporting calculations. Please provide documentation to support the ion exchange equipment selection within the installed treatment system including treatment goals, analysis related to competing ions, system hydraulic flow rate, and the system limiting step (water supply, specific treatment component).
4. According to Section 1.2.6(b) of the Design Criteria, a description of the water quality sampling locations, the purpose and parameters being measured at the identified locations, and the means for feedback to operators must be included. The revised submittal indicates sample taps before and after a contact tank and each ion exchange column. The submittal does not appear to include parameters measured, frequency, measurement device for process verification, and means of feedback to operations. Please provide a discussion regarding sampling locations, description of parameters measured, frequency, measurement device for process verification, and means of feedback to operations.
5. Sufficiently addressed - the revised submittal does not address how the ORC is to be staffed. However, the February 2020 standard operating procedures provided in response to the December 26, 2018 Sanitary Survey Section III: Observations/Recommendations Item 1. 0997 - Operator indicates that Fred Hand is the Operator in Responsible Charge for the Rakhra Mushroom Farm drinking water facility, PWSID C00202666. Therefore this item is sufficiently addressed.
6. According to Section 1.2.9(b) of the Design Criteria, a preliminary plan of operation must be submitted for all projects that impact storage or treatment including expected basic operating configuration and process control procedures. It appears the revised submittal does not provide sufficient details on how the proposed equipment is intended to be operated and controlled. Please provide a discussion of the basic operating configuration and process controls. Where the entire treatment process is reliant on a manufacturer's controller, a copy of the manufacturer's operation and maintenance manual is satisfactory for describing process controls.
7. According to Section 1.3 and Appendix A (Design Review Matrix) of the Design Criteria, plans and specifications are required for the proposed system modifications. Manufacturer's equipment datasheets are suitable information in lieu of specifications. The revised submittal includes a flow diagram and three arsenic removal projections based on different operating pHs. The revised submittal does not appear to include equipment datasheets. Please provide equipment datasheets for all equipment related to the ion exchange system including bulk and or liquid chemical storage tanks, secondary containment, pumping, ion exchange columns, contact tank and control devices.
8. According to Sections 2.2 and 2.3 of the Design Criteria, the design must consider or provide for provisions for expansion, chemical handling/delivery, accessibility, operator safety and convenience. It does not appear that the revised submittal includes a layout for the proposed process. Please provide a layout showing approximate locations of the ion exchange system, chemical containment, access and traffic patterns around the system, nearest eyewash / safety shower, and bulk reagent storage with reference to other materials and equipment.
9. According to Sections 4.6.2 of the Design Criteria, arsenic removal efficiency based on volume of water and water quality triggers (e.g., TDS indicating breakthrough) must be used. The revised submittal does not appear to provide documentation of an operational controller or instrument based on volume of water and water quality triggers. Please provide a description of parameters the system will use to manage treatment and manufacturer's cut sheets for the water quality controller or triggering instruments.

10. According to Sections 4.6.3 of the Design Criteria, the anion exchange treatment design capacity must conform to resin manufacturer's specifications or other justification (e.g., pilot plant). Design must include an evaluation of competing ions given the feed water quality. This design submittal must include:

- a. The maximum operating capacity
- b. Empty bed contact time (EBCT)
- c. Hydraulic loading rate
- d. Acceptable pressure drop
- e. pH control (if needed)
- f. Design of service cycle and method for protection from chromatographic peaking during operation

It does not appear that the revised submittal incorporates manufacturer's specifications. The proposed resin in the revised submittal is Purolite Ferrix A33E, and Purolite recommends no free chlorine residual in the water because the resin will suffer from chlorine degradation. The proposed process flow diagram appears to indicate chlorine injection and a contact tank for disinfection prior to the ion exchange system. Please provide manufacturer's specifications as requested in Section 4.6.3 and a description on how the proposed design conforms to those specifications.

11. According to Section 4.6.6 of the Design Criteria, anionic exchange flow rates must not exceed seven gpm/ft<sup>2</sup>. Rate of flow controllers or the equivalent must be installed for restricting the maximum flowrate. The revised submittal indicates a flow controller is included but does not appear to indicate what type of flow controlling device is included. Please provide manufacturer's cut sheets of the proposed flow controller.
12. Sufficiently addressed - the revised submittal proposes a single use ion exchange resin treatment system. Therefore cross connection concerns around the ion exchange brine system are no longer relevant.
13. According to Section 9.0 of the Design Criteria, all residual waste discharges and waste disposal must be in accordance with all federal, state and/or local laws and ordinances. The revised submittal proposes a non-regenerating ion exchange treatment system. The revised submittal does not appear to identify plans for spent resin disposal or regeneration. Please provide a discussion indicating where ion exchange wastes are sent for disposal or regeneration along with documentation that regulatory, design and approval requirements are met.
14. During the sanitary survey conducted on August 30, 2018, the Department inspector identified that the supplier had not received approval, nor submitted plans and specifications to the Department for approval of the well, treatment system or storage tank utilized for contact time. Per Section 11.4(1) of Regulation 11, no person shall make improvements to or modify the treatment process of an existing water works until plans and specifications for such construction, improvements, or modifications have been submitted to, and approved by the Department. The revised submittal does not appear to address the well, storage tank, transfer pumps, pressure tanks, softening or any other installed components of the drinking water system. Please submit complete design plans and specifications for the installed treatment (well, treatment/chlorination system(s), water softener system, storage tank, pressure tank, transfer pumps) to the Department for review and approval.

In accordance with Paragraph 54(b)(i) of Drinking Water Enforcement Order No. DW.05.18.202666 issued to Colorado Mushroom Farm, LLC, within thirty (30) calendar days of issuance of these Department comments on the design, the Supplier shall resolve these comments and respond to the Department in writing. The review is on hold and will proceed upon receipt of the information listed above. Please direct any further correspondence regarding the technical approval (plans and specifications/design review) to:

Anthony Kerr, P.E.  
Colorado Department of Public Health and Environment  
Water Quality Control Division - Engineering Section  
22 South 6th Street, Room 232  
Grand Junction, CO 81501

Thank you for your time and cooperation in this matter. Please contact me by telephone at 970-248-7142 or by electronic mail at [anthony.kerr@state.co.us](mailto:anthony.kerr@state.co.us) if you have any questions.

Sincerely,

**Anthony Kerr** Digitally signed by Anthony Kerr  
Date: 2020.06.12 16:50:09 -06'00'

Anthony Kerr, P.E.  
Senior Review Engineer  
Engineering Section  
Water Quality Control Division  
Colorado Department of Public Health and Environment

cc: Fred Hand, Operator in Responsible Charge  
Della Cox-Vieira, Alamosa County Public Health Department  
Doug Camrud, WQCD ES Engineering Review Unit Manager  
Drinking Water File CO0202666  
DWCAS



## Drinking Water Enforcement Response

### Proposed Action Plan for Returning to Compliance with the Order

Submit through Portal: [wqcdcompliance.com/login](http://wqcdcompliance.com/login) (preferred) or by fax: (303) 758-1398

System Name: Rakhra Mushroom Farm		PWS ID: CO0202666
Enforcement Order Number: DW.02.20.202666		Order Issue Date: 2/24/2020
<b>How to use this form:</b> The Supplier should describe the proposed action(s) for returning to compliance with all overdue requirements of the Order. The Supplier should describe their plan to continue complying with ongoing and future requirements of the Order.		
<b>Due date:</b> This plan is due no later than fourteen (14) calendar days from the Department's Advisory letter.		
Paragraph	Overdue Requirement	Proposed Timeline to Return to Compliance
72	Submit a Revised Total Coliform Sampling Plan.	Proposed completion date: _____ (no later than 8/17/2020)
Proposed actions to return to compliance with this requirement:		
73	Submit a written backflow prevention and cross connection control program plan and an annual report	Proposed completion date: _____ (no later than 8/17/2020)
Proposed actions to return to compliance with this requirement:		
74(a)(i)	Submit a written response to the Department to resolve all comments on the design plans and specifications for system improvements to comply with the arsenic MCL.	No later than 7/12/2020 (Based on the Department's 6/12/2020 comments)
Proposed actions to return to compliance with this requirement:		
74(a)(ii)	Submit complete design plans and specifications for the well, treatment system and storage tank including any system improvements	Proposed completion date: _____ (no later than 8/17/2020)
Proposed actions to return to compliance with this requirement:		
75(a)	Submit an initial response to the Order describing the Supplier's plan for complying with the Order	N/A

Proposed actions to return to compliance with this requirement: Submitting this form will fulfill this requirement.		
75(b)	Submit written progress reports to the Department.	N/A
Proposed actions to return to compliance with this requirement: Submitting this form will fulfill the March 31, 2020 and June 30, 2020 progress report requirements.		
79	Pay the \$32,768.00 administrative penalty.	Proposed completion date: _____ (no later than 8/17/2020)
Proposed actions to return to compliance with this requirement:		
<b>Plan for Ongoing Compliance with the Order</b>		
<b>Paragraph</b>	<b>Requirement</b>	<b>Deadline</b>
71	Immediately comply with Regulation 11, 5 CCR 1002-11.	Immediately and ongoing
Plan for compliance:		
74(a)(iii)	If the Department provides comments on the design submittals, the Supplier must provide a written response that resolves all comments.	Within 30 calendar days of Department comments
Plan for compliance:		
74(b)	Complete construction/implementation of all Department-approved System improvements	Within 9 months of Department approval
Plan for compliance:		
74(c)	Certify that the System improvements were constructed/installed as approved by the Department	Within 14 days of completion
Plan for compliance:		
75(b)	Submit written progress reports to the Department.	By the last day of each calendar quarter (March 31, June 30, Sep 30, Dec 31)
Plan for compliance:		



<b>Completion</b>		
76	The Supplier shall submit a written notice of completion to the Department.	Within 14 days of completion of all requirements of the Order
Name of Person Completing this Form:		Phone:
Signature (if submitted to the Portal, no signature required):		Date:



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## **Situational Report**

### **San Luis Valley COVID-19 Response**

**Incident Name:** SLV COVID-19

**Incident Type:** COVID-19 Pandemic

**DOC Activation Level:** Level II

**Operational Period:** 06/15/2020 – 06/23/2020

**NOT FOR PUBLIC DISTRIBUTION**

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The San Luis Valley Public Health Regional Department Operations Center will be replacing our weekly stakeholder update call with a health and medical Situational Report for the 2019 novel coronavirus (COVID-19) response. These Situational Reports will be sent out every Wednesday as of 6/17/2020.

Distribution: Public health, hospitals, long term care facilities, behavioral health, emergency managers, environmental health, law enforcement, volunteer organizations, utility representatives, SLVBHG, DOLA, SBDA, USFS, DFPC, HAZMAT.

If someone in your agency needs to receive this situation report, please email [slvcovid19@gmail.com](mailto:slvcovid19@gmail.com).

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#### **Incident Summary**

On March 11, 2020, a Regional Department Operations Center (DOC) was activated to support COVID-19 response activities of public health agencies in Alamosa, Conejos, Costilla, Hinsdale, Mineral, Rio Grande, and Saguache Counties. From March 18 - April 22, the regional response support was expanded to an Emergency Coordination Group (ECG). On April 23 regional coordination resumed under the Public Health Regional DOC, currently operating at Level II as defined in the participating agencies' Public Health Emergency Operations Plans. Response activities are also being coordinated with partners through the SLV Healthcare Coalition. This situation report is focused on health and medical aspects of the COVID-19 response in the San Luis Valley.

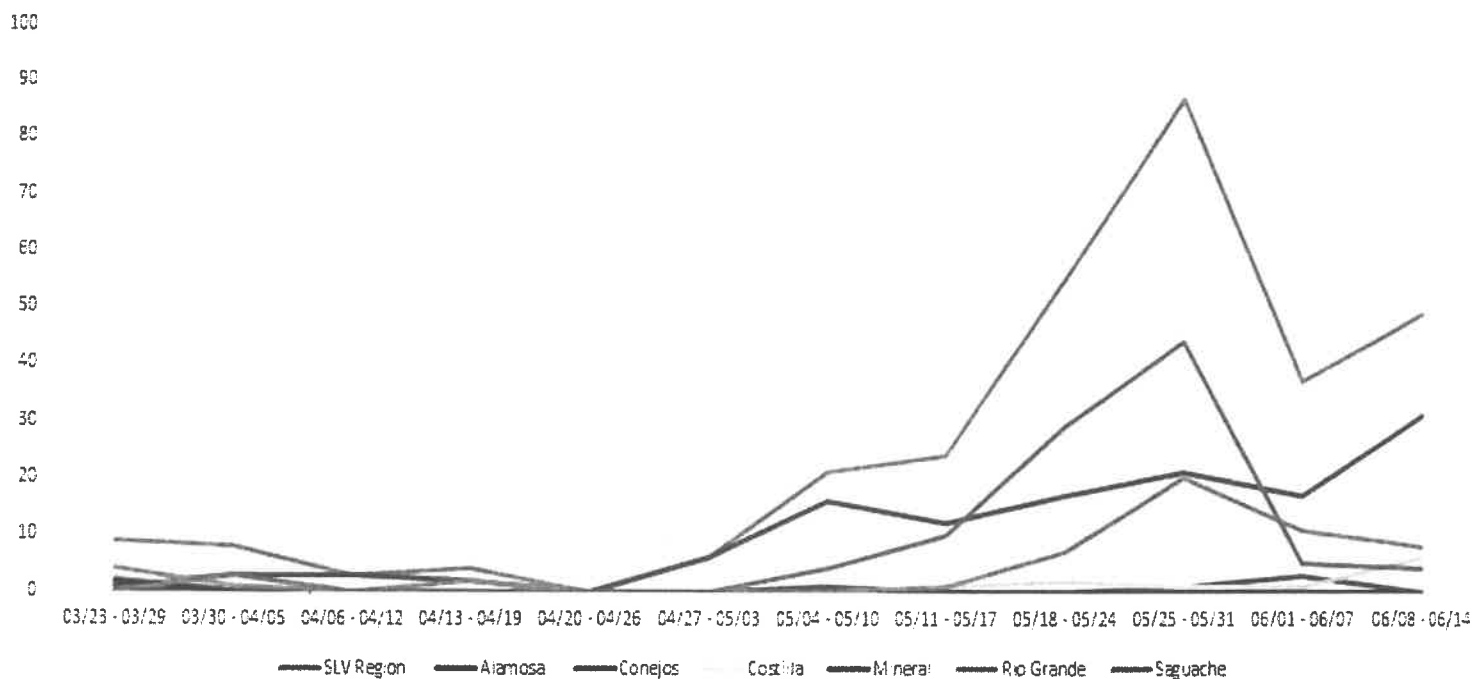
## San Luis Valley Case Summary

Note: This summary only includes data through 06/15/20 and does not reflect cases since then.

	Cases to date	Hospitalized to date	Isolation completed	Deaths to date*
Alamosa	130	16	80	3
Conejos	7	0	1	
Costilla	14	1	7	
Mineral	2	1	2	
Rio Grande	54	4	42	
Saguache	99	3	78	2
TOTAL	306	25	210	5

\* These are fatalities in persons who tested positive for COVID-19.

New reported cases by week: SLV Region and Counties





## Food, Water, Shelter

- **Shelter:** Currently there are no plans for Alternate Care Sites in the San Luis Valley. We have identified two possible locations, but there is no medical support for either of these locations. There will be lots of overhead needed to make either location work. CDPHE has identified several ACS sites in Colorado. (See CDPHE Situation Report.) A local hotel has been identified as a location for Self-Isolation for those who do not have an adequate option to self-isolate at home.
- **Agriculture:** Outbreaks identified at multiple food production locations. See “outbreaks” below.

## Health and Medical

- **Hospitalizations:** SLV Health Regional Medical Center is designated as the COVID-19 facility for the San Luis Valley. COVID-related hospitalizations and outpatient respiratory care volumes have been increasing recently.
- **Testing** is being done by SLV Health, Rio Grande Hospital, and Valley Wide Health Systems. Additional support for testing is available through CDPHE’s Rapid Response Teams, one of which will provide testing at one of our long-term care facilities next week. In addition, Valley Wide Health Systems has the following testing events scheduled:
  - 6/17/20 - Center
  - 6/22/20 - San Luis
  - 6/23/20 - La Jara
  - 6/24/20 - Center
  - 6/29/20 - Antonito
  - 6/30/20 - Saguache

To date, there have been 1879 tests completed for SLV residents. Our rate of testing has increased from an average of 55 tests per week in April to 418 per week so far in the month of June.

- **Outbreaks** have been reported at the Colorado Mushroom Farm, Mountain King Potatoes, Hi-Land Potato, Idaho Pacific, Advantage Treatment Center, San Luis Care Center, and SLV Health. Additional clusters of COVID-19 cases have been identified at some workplaces, but investigations are underway to determine whether these additional cases constitute outbreaks under the state’s definition or whether they are a reflection of general community spread.
- **Alternate Care Sites** developed by the State for step-down care of post-discharge hospital patients are currently in dormant or development status. Planning discussions are underway to coordinate hospital discharge planning under COVID surge conditions within the region, as a pre-condition for potentially accessing statewide Alternate Care Sites.
- **Behavioral Health:** San Luis Valley Behavioral Health Group is offering onsite and virtual behavioral health services. For more information: <https://www.slvbhg.org/>

## Communications

The SLV DOC PIO provides daily updates every afternoon to the media and other partners. See [www.slvemergency.org](http://www.slvemergency.org) for daily situation and statistical updates.

The SLV Joint Information Center holds virtual meetings Mondays at 9:30 am and Wednesdays at 10:30 a.m. Regional PIO contact: [kcrowder@alamosacounty.org](mailto:kcrowder@alamosacounty.org).

Current areas focus include bilingual messaging, testing information, and general updates for businesses and the public.





Della Cox-Vieira <dcoxvieira@alamosacounty.org>

## DW Compliance Assurance Correspondence - Colorado Mushroom Farm, LLC

1 message

**Bisgard - CDPHE, Leticia** <leticia.bisgard@state.co.us>

Thu, Jun 18, 2020 at 10:27 AM

To: Don Clair <IDCLAIR1954@gmail.com>, ARSHLAMBA@yahoo.com, TALLESTMAN56@gmail.com

Cc: Bryan Pilson - CDPHE <bryan.pilson@state.co.us>, "Delgado - CDPHE, Jorge" <jorge.a.delgado@state.co.us>, Sean Scott - CDPHE <sean.scott@state.co.us>, "Talbot - CDPHE, Margaret" <margaret.talbot@state.co.us>, Siobhan Yoest - CDPHE <siobhan.yoest@state.co.us>, Timothy Jones - CDPHE <timothy.jones@state.co.us>, Della Cox-Vieira <dcoxvieira@alamosacounty.org>, Irappold <lrappold@alamosacounty.org>

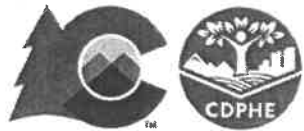
Please see attached for your electronic copy of the above referenced document. Please contact the signer of the document regarding any questions or issues with the content of the letter. If there are any issues with opening the attachment, please do not hesitate to contact me.

*\*The attached document is CDPHE official correspondence to you in electronic format. You will be receiving a hard copy of this document in the mail.*

**Leticia M. Bisgard**

Administrative Assistant

Compliance Assurance Section



**COLORADO**

**Water Quality Control Division**

Department of Public Health & Environment

P 303.692.3217 | F 303.758.1398

4300 Cherry Creek Drive South, Denver, CO 80246

leticia.bisgard@state.co.us | [www.colorado.gov/cdphe/wqcd](http://www.colorado.gov/cdphe/wqcd)

24-hr Environmental Release/Incident Report Line: 1.877.518.5608 | Total Coliform Positive Report Line: 303.692.3308

### 2 attachments



**CO0202666 \$ WQ.DW.9.5 \$ 06-18-2020 \$ A \$ DW.02.20.202666 Failure to Comply with the Requirements of the Order.pdf**  
152K



**DW.02.20.202666 Proposed Action Plan for Returning to Compliance with the Order.docx**  
48K





**COLORADO**  
Department of Public  
Health & Environment

Dedicated to protecting and improving the health and environment of the people of Colorado

June 18, 2020

PWSID# CO0202666

Baljit Nanda, Registered Agent  
Colorado Mushroom Farm, LLC  
10459 Park Meadows Drive  
Suite 101  
Littleton, CO 80124

**Compliance Advisory - Enforcement Order Number DW.02.20.202666**  
**Failure to Comply with the Requirements of the Order**

Baljit Nanda:

On February 24, 2020, the Colorado Department of Public Health and Environment ("Department") issued Enforcement Order Number DW.02.20.202666 to the Colorado Mushroom Farm, LLC ("Supplier") for the Rakhra Mushroom Farm drinking water system ("System"). The Order was issued as a result of the Supplier's failure to comply with Enforcement Order Number DW.05.18.202666, issued on May 7, 2018, and failure to comply with 5 CCR 1002-11, the Colorado Primary Drinking Water Regulations ("Regulation 11").

As of the date of this letter, Department records indicate that the Supplier has failed to complete one or more requirements by the deadlines specified in the Compliance Requirements section of Order Number DW.02.20.202666. Below is a summary of the requirements that are currently incomplete and past due:

Paragraph in Order	Overdue Requirement	Deadline	Days in Violation of Requirement
71	Immediately comply with Regulation 11.  Status: Since the date of the Order, the Supplier has incurred two additional violations of the arsenic maximum contaminant level (MCL) for first quarter 2020 and second quarter 2020.	Immediately and ongoing	Ongoing



72	<p>Submit a copy of the Revised Total Coliform Sampling Plan.</p> <p>Status: The Department has not received a response from the Supplier.</p>	March 25, 2020	85 days
73	<p>Submit a copy of the complete backflow prevention and cross-connection control program.</p> <p>Status: The Department has not received a response from the Supplier.</p>	April 24, 2020	55 days
74(a)(i)	<p>Submit a written response that resolves all Department comments on the design plans and specifications for System improvements to comply with the arsenic MCL.</p> <p>Status: The Source H2O submitted a response to the Department on June 4, 2020 that did not fully resolve the Department comments.</p>	May 24, 2020	25 days
74(a)(ii)	<p>Submit complete design plans and specifications for the well, treatment system and storage tank including any System improvements to comply with Regulation 11 and Policy DW-005, <i>State of Colorado Design Criteria for Potable Water Systems</i>.</p> <p>Status: The Department has not received a response from the Supplier.</p>	May 24, 2020	25 days
75(a)	<p>Submit an initial response to the Order describing the Supplier's plan for complying with the Order.</p> <p>Status: The Department has not received a response from the Supplier.</p>	March 25, 2020	85 days
75(b)	<p>Submit quarterly written progress reports.</p> <p>Status: The Department has not received a response from the Supplier.</p>	March 31, 2020	79 days
79	<p>Pay the \$32,768.00 administrative penalty.</p> <p>Status: The Department has not received a response from the Supplier.</p>	April 24, 2020	55 days

Failure to comply with the requirements of the Order constitutes a violation of the Order. As advised in the Order, under 25-1-114.1 of the Colorado Revised Statutes, violators of the Regulations or final Enforcement Orders issued by the Department are subject to civil or administrative penalties of up to one thousand dollars (\$1000.00) per violation per day, to be imposed by the Department or a State District Court.

**The Department is currently evaluating additional enforcement actions, escalated penalties and litigation for the Supplier's violation of the Order.**

The Department requires that the Supplier respond to this Advisory with a proposed plan and schedule to return to compliance with the Order. The Department will review the adequacy of the Supplier's proposed plan and determine the appropriate course of action. The Supplier will be notified of the Department's determination in writing. The requirements and deadlines in the Order continue to apply to the Supplier unless otherwise specified by the Department in writing, and violations may subject the Supplier to civil or administrative penalties.

**Response Required by 5:00 PM on July 2, 2020:**

1. The Supplier must submit a written response to this Advisory identifying their plan to return to full compliance with all requirements of the Order within sixty (60) calendar days. The plan must include proposed corrective actions, a funding strategy (if applicable), and deadlines for completing the corrective actions.
2. The Supplier must also submit a written response to this Advisory describing their plan for continued compliance with ongoing and future requirements of the Order.

Enclosed is a form that the Supplier may use to respond to this Advisory. While the form is not required, and does not replace the Supplier's responsibility for reporting to the Department, the Department encourages the Supplier to use the provided form.

If there are any questions regarding the Supplier's enforcement requirements, please contact Timothy Jones by phone at 303-692-2085 or via e-mail at [timothy.jones@state.co.us](mailto:timothy.jones@state.co.us).

**Enclosures:**

Drinking Water Enforcement Response - Proposed Action Plan for Returning to Compliance with the Order

cc: Drinking Water Enforcement File DW.02.20.202666

ec: Donald Clair, Administrative Contact, [idclair1954@gmail.com](mailto:idclair1954@gmail.com)  
Arsh Lamba, Owner Representative, [arshlamba@yahoo.com](mailto:arshlamba@yahoo.com)

Fred Hand, Operator, [tallestman56@gmail.com](mailto:tallestman56@gmail.com), [bhand458@gmail.com](mailto:bhand458@gmail.com)  
Lynnea Rappold, Alamosa County Public Health Department,  
[lrappold@alamosacounty.org](mailto:lrappold@alamosacounty.org)  
Della Cox-Vieira, Alamosa County Public Health Department,  
[dcoxvieira@alamosacounty.org](mailto:dcoxvieira@alamosacounty.org)  
SQF Institute, Re: Certification # 15062 | 94415 - 2345 Crystal Dr. Suite 800,  
Arlington, VA 22202  
Justin Trubee, Division of Environmental Health and Sustainability, CDPHE  
Sean Scott, Division of Environmental Health and Sustainability, CDPHE  
Andrea Beebout, Clean Water Enforcement Unit, CDPHE  
Kelly Morgan, Clean Water Enforcement Unit, CDPHE  
Heather Young, Field Services Section, CDPHE

File: CO0202666, ALAMOSA COUNTY, NON-TRANSIENT, NON-COMMUNITY - GROUNDWATER



## Drinking Water Enforcement Response

### Proposed Action Plan for Returning to Compliance with the Order

Submit through Portal: [wqcdcompliance.com/login](http://wqcdcompliance.com/login) (preferred) or by fax: (303) 758-1398

System Name: Rakhra Mushroom Farm

PWS ID: CO0202666

Enforcement Order Number: DW.02.20.202666

Order Issue Date: 2/24/2020

**How to use this form:** The Supplier should describe the proposed action(s) for returning to compliance with all overdue requirements of the Order. The Supplier should describe their plan to continue complying with ongoing and future requirements of the Order.

**Due date:** This plan is due no later than fourteen (14) calendar days from the Department's Advisory letter.

Paragraph	Overdue Requirement	Proposed Timeline to Return to Compliance
72	Submit a Revised Total Coliform Sampling Plan.	Proposed completion date: _____ (no later than 8/17/2020)
Proposed actions to return to compliance with this requirement:		
73	Submit a written backflow prevention and cross connection control program plan and an annual report	Proposed completion date: _____ (no later than 8/17/2020)
Proposed actions to return to compliance with this requirement:		
74(a)(i)	Submit a written response to the Department to resolve all comments on the design plans and specifications for system improvements to comply with the arsenic MCL.	No later than 7/12/2020 (Based on the Department's 6/12/2020 comments)
Proposed actions to return to compliance with this requirement:		
74(a)(ii)	Submit complete design plans and specifications for the well, treatment system and storage tank including any system improvements	Proposed completion date: _____ (no later than 8/17/2020)
Proposed actions to return to compliance with this requirement:		
75(a)	Submit an initial response to the Order describing the	N/A

	Supplier's plan for complying with the Order	
Proposed actions to return to compliance with this requirement: Submitting this form will fulfill this requirement.		
75(b)	Submit written progress reports to the Department.	N/A
Proposed actions to return to compliance with this requirement: Submitting this form will fulfill the March 31, 2020 and June 30, 2020 progress report requirements.		
79	Pay the \$32,768.00 administrative penalty.	Proposed completion date: _____ (no later than 8/17/2020)
Proposed actions to return to compliance with this requirement:		
<b>Plan for Ongoing Compliance with the Order</b>		
<b>Paragraph</b>	<b>Requirement</b>	<b>Deadline</b>
71	Immediately comply with Regulation 11, 5 CCR 1002-11.	Immediately and ongoing
Plan for compliance:		
74(a)(iii)	If the Department provides comments on the design submittals, the Supplier must provide a written response that resolves all comments.	Within 30 calendar days of Department comments
Plan for compliance:		
74(b)	Complete construction/implementation of all Department-approved System improvements	Within 9 months of Department approval
Plan for compliance:		
74(c)	Certify that the System improvements were constructed/installed as approved by the Department	Within 14 days of completion
Plan for compliance:		
75(b)	Submit written progress reports to the Department.	By the last day of each calendar quarter (March 31, June 30, Sep 30, Dec 31)
Plan for compliance:		

<b>Completion</b>		
76	The Supplier shall submit a written notice of completion to the Department.	Within 14 days of completion of all requirements of the Order
Name of Person Completing this Form:		Phone:
Signature (if submitted to the Portal, no signature required):		Date:







**COLORADO**  
Department of Public  
Health & Environment

June 12, 2020

Don Clair / Administrative Contact  
Rakhra Mushroom Farm  
10719 County Road 5 S.  
Alamosa, CO 81101

Subject: Second Request for Information; Drinking Water Plan Submittal  
Arsenic Treatment System, Rakhra Mushroom Farm  
Public Water System Identification (PWSID) No. CO0202666, Alamosa County  
Enforcement Order No. DW.05.18.202666, ES Project No. ES.18.DWDR.04562

Dear Mr. Clair:

The Colorado Department of Public Health and Environment (Department), Water Quality Control Division has received and reviewed the plans and specifications submittal dated September 28, 2018 for the Rakhra Mushroom Farm Arsenic Treatment System. Additionally, the Department has received and reviewed the additional information (revised submittal) e-mailed June 4, 2020 by The Source H2O. These reviews have been performed in accordance with Section 11.4(1)(b) of the *Colorado Primary Drinking Water Regulations* (Regulation 11). The proposed public water system design does not meet the requirements of the *State of Colorado Design Criteria for Potable Water Systems* (Design Criteria) and cannot be approved at this time (e.g., Item 10 below notes that the process flow diagram indicates chlorine injection prior to the ion exchange system, which is not recommended by the resin manufacturer as chlorine degrades the resin). The review process for this project has been placed on hold pending resolution of the following issues. For clarity, the numbering system for these issues follows the number system in the Department's initial January 16, 2019 request for additional information letter, and identifies the items that were sufficiently addressed or remain unresolved at this time.

1. According to Section 1.2.3(b) of the Design Criteria, Table 1.2, line (xv), design submittals for all waterworks projects that impact treatment must include water quality results depending on the proposed or installed treatment processes. For anion exchange modifications or additions to existing processes, other than nitrate removal, the design submittal must include water quality results for:
  - a. pH
  - b. Temperature
  - c. Alkalinity
  - d. Sulfate
  - e. Chloride
  - f. Any competing anions

The supplier has provided water quality data through the Department's drinking water portal for arsenic, nitrate, organics and some inorganics, but the supplier does not appear to have provided alkalinity, sulfate, chloride, or data for competing ions specific to the proposed resin. Per Table 1.2 and Table 1.3 of the Design Criteria, please provide two water quality data results, from different calendar months, that includes the above listed analytes.

2. According to Section 1.2.4 of the Design Criteria, the process flow diagram must show all major liquid and solids flow paths through various unit processes and include proposed sampling locations and bypasses. Also, it must show chemical feed locations, flow metering and control locations. The revised



flow diagram identifies sodium hypochlorite injection and a contact tank prior to two non-regenerating ion exchange columns. The flow diagram does not appear to include the installed process equipment including well, storage tank and transfer pumps. Please revise the flow diagram to show all proposed and installed process equipment, flow paths, sample locations, metering and controls.

3. According to Section 1.2.5 of the Design Criteria, treatment related capacity and design calculations for the addition of new treatment processes to an existing treatment plant, must be submitted per paragraph (b), lines (i) thru (v). The revised submittal provides three arsenic removal projections based on different operating pHs. The submittal does not appear to include details related to the installed treatment system, treatment goals, equipment design parameters or supporting calculations. Please provide documentation to support the ion exchange equipment selection within the installed treatment system including treatment goals, analysis related to competing ions, system hydraulic flow rate, and the system limiting step (water supply, specific treatment component).
4. According to Section 1.2.6(b) of the Design Criteria, a description of the water quality sampling locations, the purpose and parameters being measured at the identified locations, and the means for feedback to operators must be included. The revised submittal indicates sample taps before and after a contact tank and each ion exchange column. The submittal does not appear to include parameters measured, frequency, measurement device for process verification, and means of feedback to operations. Please provide a discussion regarding sampling locations, description of parameters measured, frequency, measurement device for process verification, and means of feedback to operations.
5. Sufficiently addressed - the revised submittal does not address how the ORC is to be staffed. However, the February 2020 standard operating procedures provided in response to the December 26, 2018 Sanitary Survey Section III: Observations/Recommendations Item 1. 0997 - Operator indicates that Fred Hand is the Operator in Responsible Charge for the Rakhra Mushroom Farm drinking water facility, PWSID CO0202666. Therefore this item is sufficiently addressed.
6. According to Section 1.2.9(b) of the Design Criteria, a preliminary plan of operation must be submitted for all projects that impact storage or treatment including expected basic operating configuration and process control procedures. It appears the revised submittal does not provide sufficient details on how the proposed equipment is intended to be operated and controlled. Please provide a discussion of the basic operating configuration and process controls. Where the entire treatment process is reliant on a manufacturer's controller, a copy of the manufacturer's operation and maintenance manual is satisfactory for describing process controls.
7. According to Section 1.3 and Appendix A (Design Review Matrix) of the Design Criteria, plans and specifications are required for the proposed system modifications. Manufacturer's equipment datasheets are suitable information in lieu of specifications. The revised submittal includes a flow diagram and three arsenic removal projections based on different operating pHs. The revised submittal does not appear to include equipment datasheets. Please provide equipment datasheets for all equipment related to the ion exchange system including bulk and or liquid chemical storage tanks, secondary containment, pumping, ion exchange columns, contact tank and control devices.
8. According to Sections 2.2 and 2.3 of the Design Criteria, the design must consider or provide for provisions for expansion, chemical handling/delivery, accessibility, operator safety and convenience. It does not appear that the revised submittal includes a layout for the proposed process. Please provide a layout showing approximate locations of the ion exchange system, chemical containment, access and traffic patterns around the system, nearest eyewash / safety shower, and bulk reagent storage with reference to other materials and equipment.
9. According to Sections 4.6.2 of the Design Criteria, arsenic removal efficiency based on volume of water and water quality triggers (e.g., TDS indicating breakthrough) must be used. The revised submittal does not appear to provide documentation of an operational controller or instrument based on volume of water and water quality triggers. Please provide a description of parameters the system will use to manage treatment and manufacturer's cut sheets for the water quality controller or triggering instruments.

10. According to Sections 4.6.3 of the Design Criteria, the anion exchange treatment design capacity must conform to resin manufacturer's specifications or other justification (e.g., pilot plant). Design must include an evaluation of competing ions given the feed water quality. This design submittal must include:
  - a. The maximum operating capacity
  - b. Empty bed contact time (EBCT)
  - c. Hydraulic loading rate
  - d. Acceptable pressure drop
  - e. pH control (if needed)
  - f. Design of service cycle and method for protection from chromatographic peaking during operation

It does not appear that the revised submittal incorporates manufacturer's specifications. The proposed resin in the revised submittal is Purolite Ferrix A33E, and Purolite recommends no free chlorine residual in the water because the resin will suffer from chlorine degradation. The proposed process flow diagram appears to indicate chlorine injection and a contact tank for disinfection prior to the ion exchange system. Please provide manufacturer's specifications as requested in Section 4.6.3 and a description on how the proposed design conforms to those specifications.

11. According to Section 4.6.6 of the Design Criteria, anionic exchange flow rates must not exceed seven gpm/ft<sup>2</sup>. Rate of flow controllers or the equivalent must be installed for restricting the maximum flowrate. The revised submittal indicates a flow controller is included but does not appear to indicate what type of flow controlling device is included. Please provide manufacturer's cut sheets of the proposed flow controller.
12. Sufficiently addressed - the revised submittal proposes a single use ion exchange resin treatment system. Therefore cross connection concerns around the ion exchange brine system are no longer relevant.
13. According to Section 9.0 of the Design Criteria, all residual waste discharges and waste disposal must be in accordance with all federal, state and/or local laws and ordinances. The revised submittal proposes a non-regenerating ion exchange treatment system. The revised submittal does not appear to identify plans for spent resin disposal or regeneration. Please provide a discussion indicating where ion exchange wastes are sent for disposal or regeneration along with documentation that regulatory, design and approval requirements are met.
14. During the sanitary survey conducted on August 30, 2018, the Department inspector identified that the supplier had not received approval, nor submitted plans and specifications to the Department for approval of the well, treatment system or storage tank utilized for contact time. Per Section 11.4(1) of Regulation 11, no person shall make improvements to or modify the treatment process of an existing water works until plans and specifications for such construction, improvements, or modifications have been submitted to, and approved by the Department. The revised submittal does not appear to address the well, storage tank, transfer pumps, pressure tanks, softening or any other installed components of the drinking water system. Please submit complete design plans and specifications for the installed treatment (well, treatment/chlorination system(s), water softener system, storage tank, pressure tank, transfer pumps) to the Department for review and approval.

In accordance with Paragraph 54(b)(i) of Drinking Water Enforcement Order No. DW.05.18.202666 issued to Colorado Mushroom Farm, LLC, within thirty (30) calendar days of issuance of these Department comments on the design, the Supplier shall resolve these comments and respond to the Department in writing. The review is on hold and will proceed upon receipt of the information listed above. Please direct any further correspondence regarding the technical approval (plans and specifications/design review) to:

Anthony Kerr, P.E.  
Colorado Department of Public Health and Environment  
Water Quality Control Division - Engineering Section  
22 South 6th Street, Room 232  
Grand Junction, CO 81501

Thank you for your time and cooperation in this matter. Please contact me by telephone at 970-248-7142 or by electronic mail at anthony.kerr@state.co.us if you have any questions.

Sincerely,

**Anthony Kerr** Digitally signed by Anthony Kerr  
Date: 2020.06.12 16:50:09 -06'00'

Anthony Kerr, P.E.  
Senior Review Engineer  
Engineering Section  
Water Quality Control Division  
Colorado Department of Public Health and Environment

cc: Fred Hand, Operator in Responsible Charge  
Della Cox-Vieira, Alamosa County Public Health Department  
Doug Camrud, WQCD ES Engineering Review Unit Manager  
Drinking Water File CO0202666  
DWCAS



Della Cox-Vieira <dcoxvieira@alamosacounty.org>

## Fwd: Migrant and Seasonal Farm Worker Exploratory Coordination Group Follow Up

4 messages

Eric Treinen <etreinen@alamosacounty.org>

Fri, Jun 19, 2020 at 12:33 PM

To: Darius Allen <dallen@alamosacounty.org>, Della Cox-Vieira <dcoxvieira@alamosacounty.org>, Gigi Dennis <gdennis@alamosacounty.org>, Helen Sigmond <hsigmond@alamosacounty.org>, Michael Yohn <myohn@alamosacounty.org>

Here are the slides from today's meeting. Please look at slide 7, I think, it has a good visual of where COVID is.

Thanks,  
Eric

----- Forwarded message -----

From: **Whitehead - CDPS, Claire** <claire.whitehead@state.co.us>

Date: Fri, Jun 19, 2020 at 12:29 PM

Subject: Migrant and Seasonal Farm Worker Exploratory Coordination Group Follow Up

To: Aimee Voht Siebert - CDPHE <aimee.vohtsiebert@state.co.us>, <amcarrera@adcogov.org>, <asegura@cbores.org>, Betty Velasquez - CDLE <betty.velasquez@state.co.us>, <blake.angelo@gmail.com>, <brian@centerco.gov>, Charlotte Olsen - CDHS <charlotte.olsen@state.co.us>, <chris.rodriguez@costillacounty-co.gov>, <cindy@ppunitedway.org>, Crestina Martinez - GOVOffice <crestina.martinez@state.co.us>, Cristabel Rojo - CDPHE <cristabel.rojo@state.co.us>, Danielle Oliveto - GOVOffice <danielle.oliveto@state.co.us>, David Osborn - CDPS <david.osborn@state.co.us>, Devon Rhoads - CDPS <devon.rhoads@state.co.us>, <director@onemorgancounty.org>, <dolores.breceda@gmail.com>, Donald Moore - CDPS <donald.moore@state.co.us>, Elisabeth Arenales - GOVOffice <elisabeth.arenales@state.co.us>, <em@hinsdalecountycolorado.us>, <etreinen@alamosacounty.org>, <fatuma@frontlinefarming.org>, <flora@slvic.org>, Gigi Dennis <gdennis@alamosacounty.org>, Ginger Stringer - CDPHE <ginger.stringer@state.co.us>, <gonzaleds@vwhs.org>, Greg Stasinos - CDPHE <greg.stasinos@state.co.us>, Hana Sayeed - GovOffice <hana.sayeed@state.co.us>, <hxv7@cdc.gov>, Kurle - CDPS, Jaclyn <jaclyn.kurle@state.co.us>, Richards, Jamie <jamie.richards@hq.dhs.gov>, Jordan Beezley - CDA <jordan.beezley@state.co.us>, Maes, Jory <jory.maes@hq.dhs.gov>, <julia.beems@ucdenver.edu>, Kacey Wulff - GOVOffice <kacey.wulff@state.co.us>, Kate Greenberg - CDA <kate.greenberg@state.co.us>, Kerri Brown - CDPHE <kerri.brown@state.co.us>, Klein - CDPS, Kevin <kevin.klein@state.co.us>, Kit Taintor - GovOffice <kit.taintor@state.co.us>, Kristen Fedak - CDPHE <kristen.fedak@state.co.us>, Kristina McGowan - CDHS <kristina.mcgowan@state.co.us>, <lmurillo@center.k12.co.us>, Lori Kennedy - CDPHE <lori.kennedy@state.co.us>, Linda Smith <lsmith@alamosacounty.org>, Maggie Baldwin - CDA <maggie.baldwin@state.co.us>, Mark Boley - CDPS <mark.boleyn@state.co.us>, Willis - CDPS, Mike <mike.willis@state.co.us>, <mincoemc@gmail.com>, Nisha Alden - CDPHE <nisha.alden@state.co.us>, Olga Ruiz - CDLE <olga.ruiz@state.co.us>, <phyllis.kane@lfsrm.org>, Rachel Jervis - CDPHE <rachel.jervis@state.co.us>, <rgcoem@riograndecounty.org>, <rodney@co.conejos.co.us>, <ron.ridley@costillacounty-co.gov>, <rwoelz@saguachecounty-co.gov>, Sadie Martinez - CDPS <sadie.martinez@state.co.us>, Sarah Hernandez - CDPHE <sarah.hernandez@state.co.us>, Sarah Tuneberg - CDPHE <sarah.tuneberg@state.co.us>, Scott Bookman - CDPHE <scott.bookman@state.co.us>, Steve Silverman - CDA <steve.silverman@state.co.us>, Trevor Denney - CDPS <trevor.denney@state.co.us>, <vrapp@state.gov>

Please see the attached slides and notes from this morning's call. Let me know if you have any questions!

Claire

--

**Claire Whitehead** | Executive Assistant



**COLORADO**  
Division of Homeland Security  
& Emergency Management  
Department of Public Safety

Chief of Staff's Office

2. Support to communities and individuals/families (culturally responsive public information campaign, food security, financial/emotional security)

A goal is to better coordinate and inform at the state level so that the support coming to us is more efficient and less likely to involve duplication of effort and added work on our part. As I understand it, the plan so far is as we discussed yesterday, with David and Greg acting to facilitate our state connections, I'm not sure how firm that is yet. I think this is moving in a good direction..

There is a small work group being formed to further define and kick this off early next week, and I will participate in that group. Please let me know what your questions and concerns are. David and Greg, if you have anything to correct or add to the above, please reply to all.

Thanks,

**Linda Smith, SLV EPR Coordinator**  
San Luis Valley Public Health Partnership  
Emergency Preparedness & Response  
Cell (719) 580-6779, Office (719) 587-5199  
Email [lsmith@alamosacounty.org](mailto:lsmith@alamosacounty.org)  
[www.slvphp.com](http://www.slvphp.com)  
[www.slvemergency.org](http://www.slvemergency.org)

*she/ her/ hers*



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**2 attachments**

 **State Agency Support to COVID19 Mitigation for Agricultural and Migrant and Seasonal Farm Workers in the San Luis Valley.pdf**  
510K

 **Migrant and Seasonal Workers Meeting Notes.docx**  
14K

---

**Stasinos - CDPHE, Greg** <[greg.stasinos@state.co.us](mailto:greg.stasinos@state.co.us)>

Fri, Jun 19, 2020 at 1:59 PM

To: Linda Smith <[lsmith@alamosacounty.org](mailto:lsmith@alamosacounty.org)>

Cc: Della Cox-Vieira <[dcoxvieira@alamosacounty.org](mailto:dcoxvieira@alamosacounty.org)>, Denise Jiron <[djiron@co.conejos.co.us](mailto:djiron@co.conejos.co.us)>, Janet Beiriger <[jbeiriger@saguachecounty-co.gov](mailto:jbeiriger@saguachecounty-co.gov)>, Amber Maestas <[amaestas@costillacounty-co.gov](mailto:amaestas@costillacounty-co.gov)>, Beverly Strnad <[bstrnad@alamosacounty.org](mailto:bstrnad@alamosacounty.org)>, Dianne Koshack <[dianne.koshak@riograndecounty.org](mailto:dianne.koshak@riograndecounty.org)>, Joni Adelman <[MCNurse@silverthreadphd.org](mailto:MCNurse@silverthreadphd.org)>, Lynnea Rappold <[lrappold@alamosacounty.org](mailto:lrappold@alamosacounty.org)>, Marietta Clark <[mclark@co.conejos.co.us](mailto:mclark@co.conejos.co.us)>, Tara Hardy <[tara@silverthreadphd.org](mailto:tara@silverthreadphd.org)>, Vivian Gallegos <[vgallegos@costillacounty-co.gov](mailto:vgallegos@costillacounty-co.gov)>, Kay Crowder <[kcrowder@alamosacounty.org](mailto:kcrowder@alamosacounty.org)>, Lilian Coll <[lcoll@alamosacounty.org](mailto:lcoll@alamosacounty.org)>, Paul Wertz <[pwertz@riograndecounty.org](mailto:pwertz@riograndecounty.org)>, Samantha Escobedo <[sescobedo@co.conejos.co.us](mailto:sescobedo@co.conejos.co.us)>, "Osborn - CDPS, David" <[david.osborn@state.co.us](mailto:david.osborn@state.co.us)>

Linda

Good afternoon and thank you for providing this group a great synopsis of what transpired during today's Migrant and Seasonal Farm Worker Exploratory Coordination Group discussion. I don't have any additional information to add.

I look forward to assisting in the development of the task force and supporting the San Luis Valley in this response.

Greg

[Quoted text hidden]

--

**Greg Stasinos**  
Operations/Response Section Chief



## COLORADO

Office of Emergency  
Preparedness & Response

Department of Public Health & Environment

4300 Cherry Creek Dr. S.  
OEPR-A2  
Denver, CO. 80246-1530  
303.692.3023 (O) | 303.598.9033 (C) | greg.stasinos@state.co.us

To report a community public health emergency or hazardous substance spill event, call the 24 hour Incident & Emergency Reporting Line at: 1.877.518.5608.

Due to the COVID-19 response I may be delayed in responding to your email.

For specific information, please call the CDPHE Call Center at 303-692-2700.

For general questions about COVID-19: Call CO-Help at 303-389-1687 or 1-877-462-2911 or email [COHELP@RMPDC.org](mailto:COHELP@RMPDC.org).

Additional information can at any of the following resources:

CDPHE COVID-19

CDPHE Local Public Health Contacts

CDC

WHO

---

Della Cox-Vieira <[dcoxvieira@alamosacounty.org](mailto:dcoxvieira@alamosacounty.org)>  
To: Jordan Kemp <[jkemp@alamosacounty.org](mailto:jkemp@alamosacounty.org)>

Wed, Jun 24, 2020 at 11:05 AM

Della Vieira, RN, MPH

Director

she, her, hers



Alamosa County Public Health Department  
8900 Independence Way, Suite B  
Alamosa, CO 81101  
(719 ) 589-6639  
fax (719) 589-1103



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## 2 attachments



**State Agency Support to COVID19 Mitigation for Agricultural and Migrant and Seasonal Farm Workers in the San Luis Valley.pdf**

510K



**Migrant and Seasonal Workers Meeting Notes.docx**

14K





# State Agency Support to COVID19 Mitigation for Agricultural and Migrant and Seasonal Farm Workers in the San Luis Valley

June 19th, 2020

## Agenda

1. Problem Statement
2. Current Situation in the San Luis Valley
  - a. Epidemiology
  - b. Culture
  - c. Response Organization
3. Lines of Effort (LOE)
  - a. Support to disease control and mitigation
  - b. Support to communities and individuals/families
4. State Organization Options
  - a. Task forces / working group for each LOE
  - b. Single integrated task force or working group
  - c. Independent agency work with coordination through the SEOC
5. Reporting Structure
6. Next Steps

## Problem Statement

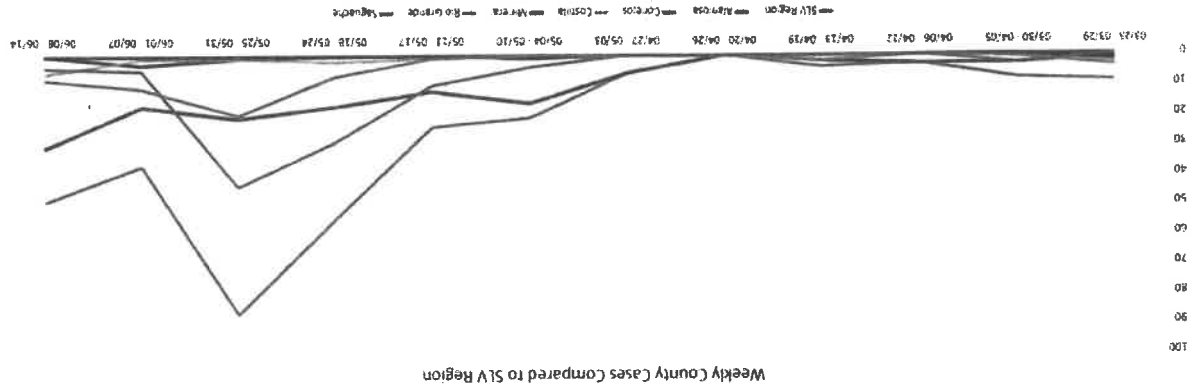
What is the best way for State agencies to support local efforts to slow COVID transmission and mitigate its effects in among agricultural workers and MSFW in the SLV?

Solution should:

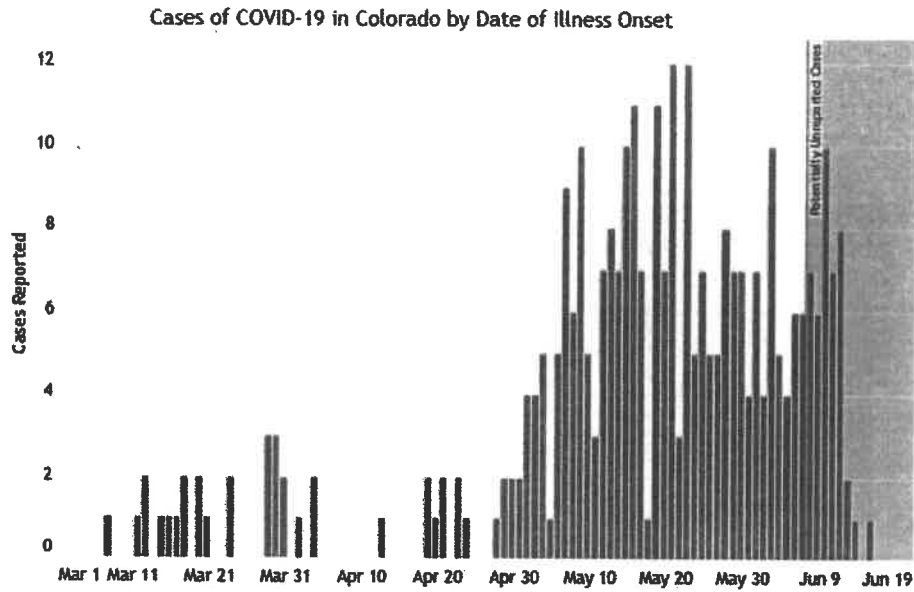
- Create unity of effort among agencies to increase efficiency and avoid redundancy
- Result in the lowest possible burden on local government and organizations
- Respect local control and enable local government success

## Current Situation in the San Luis Valley

Epidemiology

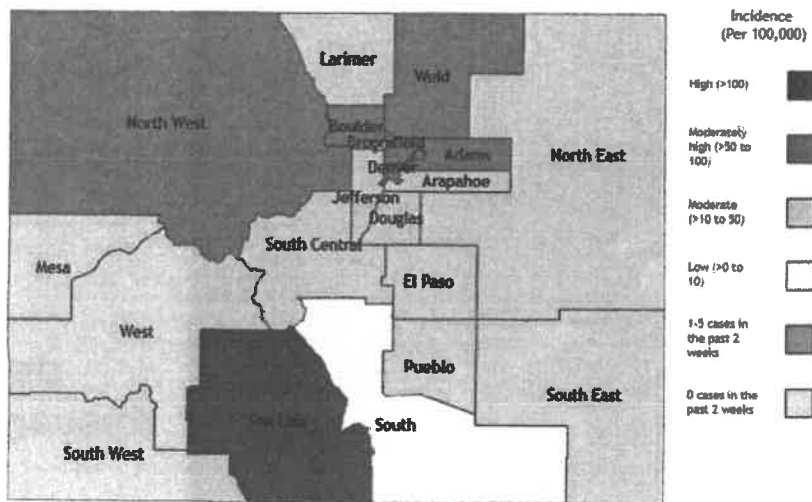


The dip in cases the week of June 1st reflects a change in the way the region is reporting cases to the public, so it is not a true reflection of a decrease in case activity. Cases are now being counted/reported by the date they are reported in CEDRS.

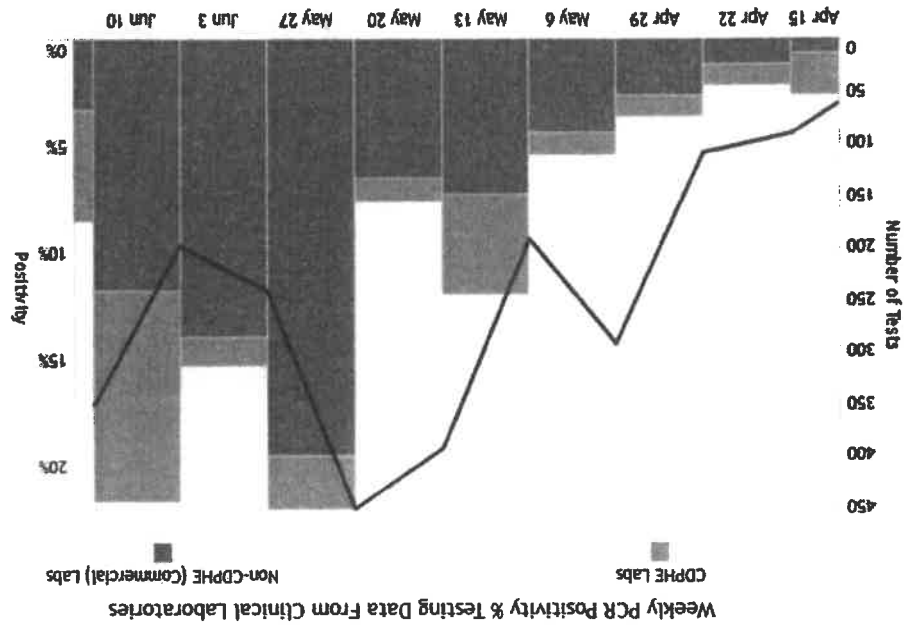
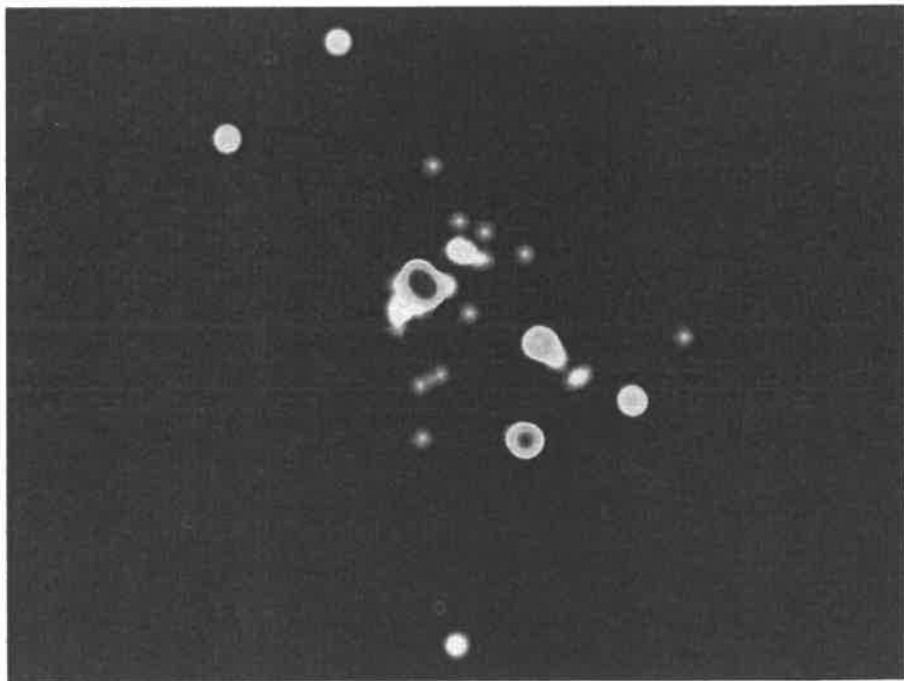


## Two Week Cumulative Incidence

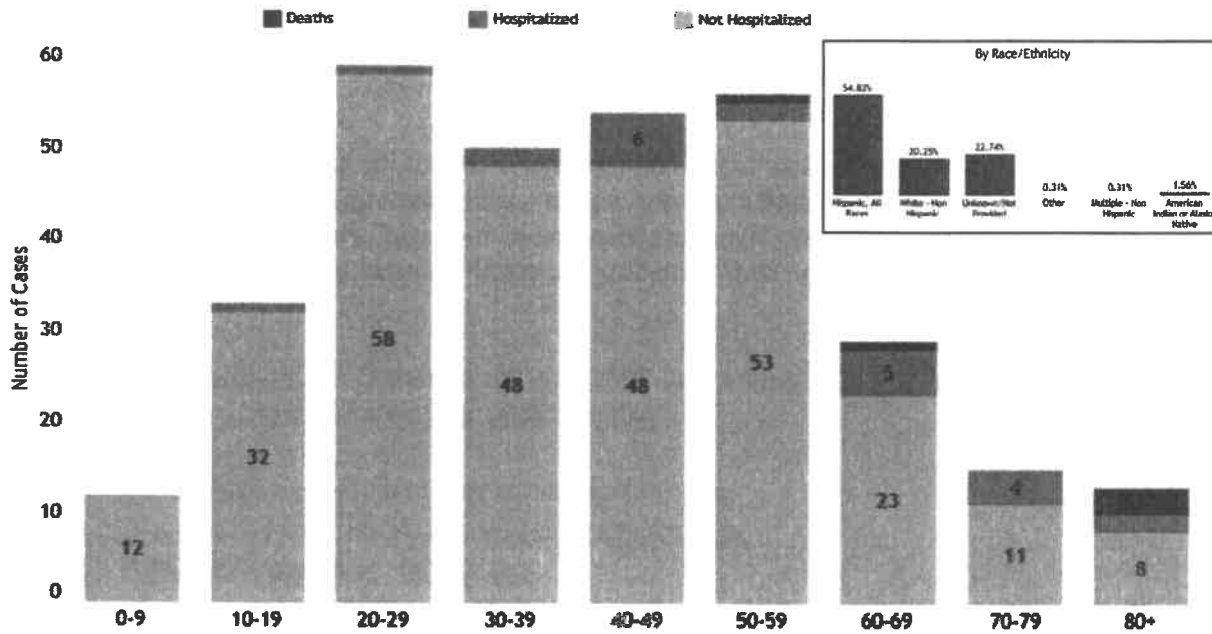
The Two-Week Cumulative Incidence Rate includes new cases reported in the past two weeks (June 4, 2020 - June 17, 2020) per 100,000 people. The rate describes recent incidence of COVID-19 infection to capture the potential burden of currently ill people who may be infectious and/or accessing healthcare.



Case Density  
Map



## Cases of COVID-19 Reported in the SLV by Age Group, Hospitalization and Outcome



## Outbreaks

- 8 outbreaks
- Located in Costilla, Alamosa, and Rio Grande Counties; impacted residents of broader SLV
- Agricultural Outbreaks
  - 4 potato farms
  - 1 mushroom farm
- Other settings
  - Corrections
  - Long-term care facility
  - Office building

## Current Situation in the San Luis Valley

**Case Count:** 349 cumulative with 242 closed cases (107 active; 5 hospitalized; 5 fatalities)

**Resources:** HCC, RETAC, Student RN's (6-12), EM Liaison, Emergency Management (7), Community Health Workers (20), CDPHE Team 4 Rapid Response (7)

**Testing:** Currently 418+ per week (5 clinics completed w/Migrant, Ag. & Farming workers) and testing continues with 6 additional scheduled by 06/30/2020

**NCS Sheltering/Housing:** No known issues at this time (120+ bed availability/Alamosa)

**Migrant, Agricultural & Farming Population:** Local Champions provide food deliveries, PPE, Public Health information - *Whole Community Model*

**Homeless Population:** Local Task Force mobilized with implemented plan (Alamosa)

**Lifelines:** Health & Medical yellow REGIONAL  
\*Alamosa Safety/Security & Food/Water/Sheltering yellow (PR Bonds/local shelter req.)

## Current Management Structure

SLV Local Public Health Departments "REGIONAL" DOC is Managing Incident

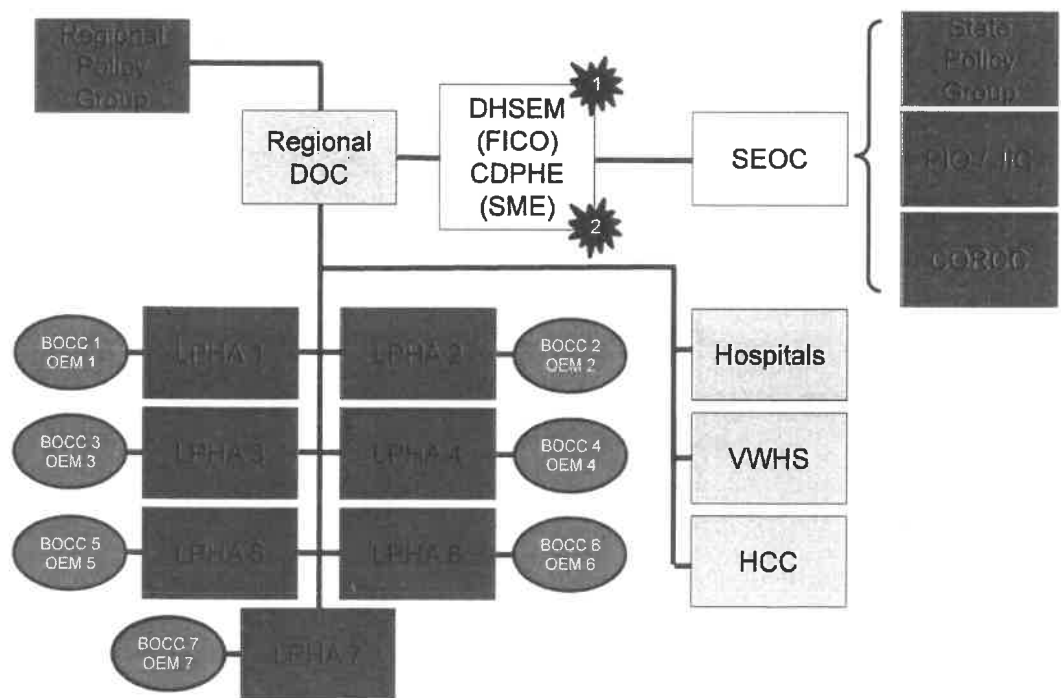
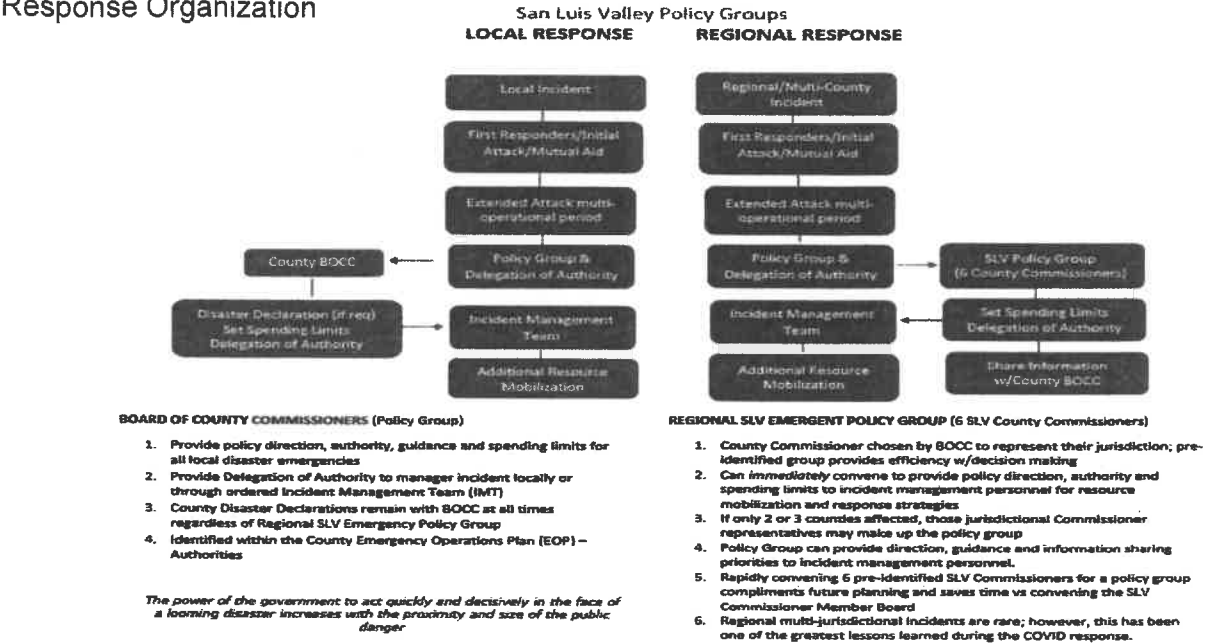
- ☐ OEPR is staffing IC, JIC, & EPI
- ☐ LPHD's are primarily providing staff for DOC
- ☐ Emergency Management providing Liaison

Day #103 - LPHD's engaged with Regional EPI  
Critical fire weather conditions, drought, Spring Fire Burn Scar flooding continue to add complexity

**Potential Solution Considerations:** Establish Regional Policy Group (BOCC); Public Health & DOC succession &/or IMT like "shadowing" planning; additional testing, increased contract tracing and data entry; restructure and/or additional overhead possibilities; alternating leadership schedule; increase information sharing efforts across all disciplines

# Current Situation in the San Luis Valley

## Response Organization





## Lines of Effort

1. Support to Disease Control and Mitigation
  - a. Purpose: Slow COVID19 transmission
  - b. Method
    - i. Testing
    - ii. Case Investigation and Contact Tracing
    - iii. Isolation / Quarantine
    - iv. Outbreak management
2. Support to Communities and Individuals/Families
  - a. Purpose: Reduce hardship and set conditions for voluntary compliance
  - b. Method
    - i. Culturally responsive public information campaign
    - ii. Food security
    - iii. Financial security
    - iv. Emotional security

## State Organization Options

1. Establish a task force for each LOE
  - a. Each TF coordinates with local response organization to deliver coordinated State support within their LOE
  - b. SEOC coordinates TF efforts and ensures each know what the other is doing
2. Establish a single task force that works both LOEs
  - a. Establish branches with the TF for the LOEs
  - b. TF leadership coordinates with local response organization to deliver coordinated State support for both LOEs
3. State agency work independently to deliver State support
  - a. State agency coordinate with the local response organization to deliver agency specific support
  - b. SEOC coordinates across engaged State agencies to integrate efforts to increase efficiency and reduce duplication
4. Other?

# Reporting Structure

- Receiving reports and information from the local response organization
  - SLV Objectives Brief
  - SLV COVID Critical Information Matrix
- Providing reports to State executive leadership



## Migrant and Seasonal Workers Meeting - June 19, 2020

### Elisabeth Arenales – Governor's Office

- Disconnect in perceived level of support
- Flow of info all the way to community
- Hospital identify needs for testing – high incidents in nurses
- Funding to community connectors
- Need to move quickly, time is of the essence

### Sadie Martinez - DHSEM

- Need for community connectors and subject matter experts

### Charlotte Olsen - CDHS

- Two task forces with overlap/integrator

### Maggie Baldwin - CDA

- Two task force approach

### Brian Lujan – Town of Center

- Testing and missing work, need to understand paid sick leave

### Dante Gonzales – Valley-Wide Health Systems

- Single entry point – Focus on testing and isolating

### Amy Voth Seibert - CDPHE

- Option 2 creates intersection of LOEs

### Mark Boley - DHSEM

- Concur with Option 2

### Crestina Martinez – Lieutenant Governor's Office

- Watch for gaps and duplication

### Director Willis will reach out to working group:

OEM, CDPHE, CDA, CDHS, CDLE, Governor's Office, Local representation (with input from Dave Osborn)

This working group will meet and later present their information to the larger group.





Della Cox-Vieira <dcoxvieira@alamosacounty.org>

## Fwd: Colorado Mushroom Farm Monthly Report

1 message

Lynnea Rappold <lrappold@alamosacounty.org>

Mon, Jun 22, 2020 at 1:28 PM

To: Della Cox-Vieira <dcoxvieira@alamosacounty.org>

FYI

Lynnea Rappold, REHS

Regional Environmental Health Program Manager

San Luis Valley Public Health Partnership

Alamosa County Public Health Department

8900 A-B Independence Way

Alamosa, CO 81101

719-587-5206

----- Forwarded message -----

From: **Pieterick - CDPHE, Joseph** <joseph.pieterick@state.co.us>

Date: Mon, Jun 22, 2020 at 7:35 AM

Subject: Colorado Mushroom Farm Monthly Report

To: Smith - CDPHE, Edward <edwardh.smith@state.co.us>, Randy Perila <randy.perila@state.co.us>, Stroud - CDPHE, Monte <monte.stroud@state.co.us>, Lynnea Rappold <lrappold@alamosacounty.org>

Please see the attached "Solid Waste Action Plan Monthly Report" dated 6/11/20 for the Colorado Mushroom Farm in Alamosa County. The last monthly report from the facility was dated 2/29/20.

In the attached report, the facility's consultant, Element Engineering LLC, is asking for another extension for complying with requirements stipulated in Compliance Order 19-10-07-01. Their current deadline for compliance with most items is 6/30/20 (7/30/20 for soil remediation). Due to COVID-19 issues which included a verified outbreak at their facility, they are requesting an extension to 9/30/20 (10/31/20 for soil remediation).

Thanks.

Joe Pieterick P.G.

Environmental Protection Specialist

Solid Waste Compliance Assurance



# COLORADO

## Hazardous Materials & Waste Management Division

Department of Public Health & Environment

O: 303-692-3355 | F: 303-759-5355

4300 Cherry Creek Drive South, Denver, CO 80246

[www.colorado.gov/cdphe/hm](http://www.colorado.gov/cdphe/hm)



CO Mushroom Farm 6-11-20 Monthly Report.pdf

888K



Della Cox-Vieira <dcoxvieira@alamosacounty.org>

---

## Fwd: Colorado Mushroom Farm Solid Waste Work Plan Extension Requests

1 message

Lynnea Rappold <lrappold@alamosacounty.org>

Mon, Jun 22, 2020 at 1:27 PM

To: Della Cox-Vieira <dcoxvieira@alamosacounty.org>

FYI

Lynnea Rappold, REHS

Regional Environmental Health Program Manager

San Luis Valley Public Health Partnership

Alamosa County Public Health Department

8900 A-B Independence Way

Alamosa, CO 81101

719-587-5206

----- Forwarded message -----

From: Pieterick - CDPHE, Joseph <joseph.pieterick@state.co.us>

Date: Mon, Jun 22, 2020 at 8:57 AM

Subject: Colorado Mushroom Farm Solid Waste Work Plan Extension Requests

To: <fstofflet@yahoo.com>, ARSHDEEP LAMBA <arshlamba@yahoo.com>, Lynnea Rappold <lrappold@alamosacounty.org>, <nmarcotte@elementengineering.net>, Smith - CDPHE, Edward <edwardh.smith@state.co.us>, Randy Perila <randy.perila@state.co.us>, Stroud - CDPHE, Monte <monte.stroud@state.co.us>

Dear Mr. Stofflet,

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division") received a Solid Waste Action Plan Monthly Report dated June 11, 2020 (the "Monthly Report") from your consultant, Element Engineering LLC ("Element"), on behalf of Colorado Mushroom Farm LLC (the "Facility"). The Monthly Report provides an updated status and requests extensions for completing certain tasks that address solid waste violations referenced in Compliance Order on Consent No.19-10-07-01 that was issued to your Facility.

Based on a review of the Monthly Report, Element's Solid Waste Action Plan Report dated June 8, 2019, a Division Solid Waste Work Plan Approval with Conditions letter dated July 8, 2019 (the "Work Plan"), and the Division's follow-up letter dated December 27, 2019, the Division grants deadline extensions for implementing the required tasks as follows:

Remove all drums and totes (Work Plan section 4.4.1)

Previous deadline: June 30, 2020

Revised deadline: September 30, 2020

Sample all stained soils after removal of drums is completed (Work Plan section 4.2.1)

Previous deadline: June 30, 2020

Revised deadline: September 30, 2020

Conduct soil remediation if necessary (Work Plan section 4.2.1)

Previous deadline: July 31, 2020  
Revised deadline: October 31, 2020

Remove all ash (Work Plan section 4.5.1).

Previous deadline: June 30, 2020  
Revised deadline: September 30, 2020

Dispose of plastics buried in piles of dirt and debris (Work Plan section 4.8.1).

Previous deadline: June 30, 2020  
Revised deadline: September 30, 2020

Remove all twine that is buried in piles of dirt and debris (Work Plan section 4.9.1).

Previous deadline: June 30, 2020  
Revised deadline: September 30, 2020

Organize or dispose of all scrap metal (Work Plan section 4.10.1).

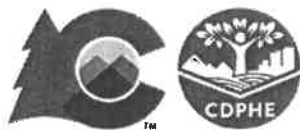
Previous deadline: June 30, 2020  
Revised deadline: September 30, 2020

The Monthly Report indicates that Facility staff contacted Alamosa County regarding the Facility's intent to incinerate used oil. The Division reminds you that in accordance with the approved Work Plan, that prior to burning waste oil at the Facility using the existing incinerator, the Facility shall contact the Colorado Department of Public Health and Environment, Air Pollution Control Division (APCD) to determine if the APCD requires additional permits, conditions, or submittals for this activity. This requirement is in addition to contacting Alamosa County.

The Division looks forward to your completion of the required actions in the Work Plan by the stipulated dates. Please feel free to contact either Joe Pieterick at 303-692-3355 or Ed Smith at 303-692-3386 with any questions.

Thank you.

Joe Pieterick P.G.  
Environmental Protection Specialist  
Solid Waste Compliance Assurance



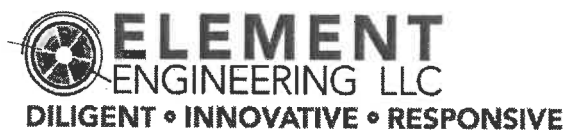
**COLORADO**

**Hazardous Materials  
& Waste Management Division**

Department of Public Health & Environment

O: 303-692-3355 | F: 303-759-5355  
4300 Cherry Creek Drive South, Denver, CO 80246  
[www.colorado.gov/cdphe/hm](http://www.colorado.gov/cdphe/hm)





## SOLID WASTE ACTION PLAN MONTHLY REPORT

Date: June 11, 2020  
To: Colorado Mushroom Farm and CDPHE  
From: Element Engineering, LLC  
EE Job No. 0073.0003  
RE: Solid Waste Action Plan Monthly Report (Updated Items in Bold)

---

CDPHE does not require a monthly report as a requirement of the Compliance Order of Consent, but Element and CMF feel that compiling monthly reports will keep information organized and concise for all parties involved. The Colorado Mushroom Farm Solid Waste Action Plan was submitted to the state on June 8, 2019 and approved with conditions on July 8, 2019. The following line items correspond to action items specified in the solid waste action plan.

CMF has been significantly affected by the COVID-19 pandemic first with the immediate drop in demand for mushrooms with the closure of restaurants and second with outbreaks of the disease within the farm itself. The typical workforce necessary to operate the farm under normal conditions is 50 – 70 employees. The farm has been operating in recent months with as little as 15 employees. As a critical food supply facility, the farm has struggled to stay operating while containing outbreaks and following recommendations and requirements from state and local health authorities.

The disease along with its impacts has slowed the farms progress on these compliance items. This report requests new deadlines for submittals to allow farm personel who have been out sick to review draft documents and generate comments and ensures that CDPHE is aware that progress is being made.

### ACTION PLAN AND SCHEDULE

#### A. Drums and Totes of Waste Oil/Liquids:

1. Remove all identified drums and totes  
Original Deadline: June 30, 2019  
Extended Deadline: **September 30, 2020**

**Status: Ongoing.** CMF has consulted the CDPHE Management Standards for Used Oil Generators Guidance Document and determined that waste oil can be incinerated for energy generation. CMF held a phone conversation with a representative at the Alamosa County office and confirmed that incinerating used oil for heat generation is a lawful disposal method for used oil if the incinerator is equipped with the regulated filter. CMF will follow all other guidelines for used oil incineration in the Management Standards for Used Oil Generators.

Currently, CMF has begun moving drums of used oil to a covered concrete wharf to store the drums while the facility's incinerator is serviced and relocated due to scheduled remodeling of the facility's

interior. The used oil drums are 55-gallon sealed polyethylene drums or 55-gallon sealed metal drums. All drums are labeled with "Used Oil" labels and are inspected regularly to ensure that there are not any leaks or oil releases to the surrounding environment.

Element has drafted an addendum to the original Solid Waste Action Plan to detail this change to the original Solid Waste Action Plan. The addendum was submitted to the state on July 31, 2019 at the same time as this monthly report.

All used oil drums have been moved to a designated storage area, as shown in Figure 1. They will be stored in the designated area until the incinerator has been repaired and relocated. Any drums and totes buried in the piles of sediment can only be removed once heavy machinery is brought on site. CMF has contacted Absmeir Landscaping to level the piles of sediment. Absmeir Landscaping began removing piles of sediment in February 2020, and the waste removal receipts were included in a previous report.



Figure 1: Organized Oil Drums

2. Remove all empty drums and totes - June 30, 2019

**Status: Complete.** CMF has transported most empty drums and totes to the San Luis Regional Landfill. There may be a few empty drums remaining, but these will be cleaned up with the rest of the debris around the property.

June 26, 2019 – 0.56 tons of empty drums

June 21, 2019 – 0.59 tons of empty drums

3. Sample unidentified drums - June 30, 2019

**Status: Complete.** CMF believes that most, if not all, of the drums of liquid waste are used oil. Through the operations at the farm, the only liquids that are generated outside of the wastewater stream are used oil and boiler water from descaling. This information was not communicated to Element at the time of drafting the original action plan. All other chemicals are disposed of immediately through the supplier. CMF is moving all drums containing used oil to a cement pad and

will contact a third party to have any other unknown drums sampled and classified if necessary. The drums that have been collected have been identified as used oil. Since the piles of dirt debris have not yet been knocked down, it is possible that more drums will be discovered, and these will be sampled as needed.

4. Open contract with Thermo Fluids for reoccurring used oil pick up - June 30, 2019

**Status: Complete.** Since CMF has decided to burn all used oil, Thermo Fluids will not need to pick up used oil. If there is a used chemical that needs to be disposed of, CMF will either contact the manufacturer or Thermo Fluids on an occasional basis. Element has drafted an addendum to the original Solid Waste Action Plan to detail this change.

5. Contact air pollution control division - June 30, 2019

**Status: Complete.** CMF held a phone conversation with Ms. Lanae at the Alamosa County office and confirmed that used oil can be incinerated for heat generation.

6. Remove all unidentified drums - July 31, 2019

**Status: Complete.** It is possible that there will not be any unidentified liquids if all the drums are determined to be used oil, which seems highly likely at this time. A third party will be contracted to sample any remaining drums that have unidentified liquids if necessary. All drums that have been collected have contained used oil. If more drums are discovered after the dirt piles of debris are leveled it is possible that more drums will be discovered and these will be sampled as needed.

7. Draft standard operating procedures for used oils and chemicals - July 31, 2019

**Status: Complete.** A written document outlining the standard operating procedures for waste liquids was drafted and included in the Operations and Maintenance manual for the Facility and was included in a previous report to the state.

B. Impacted Stained Soils:

1. Sample all stained soils after removal of drums is completed

Original Deadline: August 31, 2019

Extended Deadline: **September 30, 2020**

**Status: Incomplete.** This can be completed after all drums are removed from the waste sites.

2. Conduct soil remediation if necessary – **October 31, 2020**

**Status: Incomplete.** This will be completed if deemed necessary after stained soils are sampled.

C. Waste Concrete:

1. Remove all waste concrete and dispose of at San Luis Regional Landfill - June 30, 2019

**Status: Complete.** Most waste concrete has been removed from CMF as of July 12, 2019. It is likely that there is some waste concrete buried in the piles of sediment, but this will be disposed once these piles are broken down.

June 26, 2019 - 25.75 tons removed

June 27, 2019 – shipments of 21.26 tons, 21.29 tons, and 23.07 tons removed

D. Tires:

1. Remove all tires and dispose of at Tradebe Treatment and Recycling - July 31, 2019

**Status: Complete.** CMF has removed almost all the tires onsite and have received a Waste Tire Certificate of Registration as a Waste Tire Generator and Hauler. Some tires may be buried in the piles of sediment, but these will be disposed of after these piles are broken down.

March 8, 2019 – Received Tire Generator License

April 23, 2019 – 139 tires removed

May 7, 2019 – 40 tires removed

May 21, 2019 – 120 tires removed

E. Ash:

1. Remove all metal corners mixed in with ash - July 31, 2019

**Status: Complete.** The metal corners have been collected and removed. Refer to Figure 2.

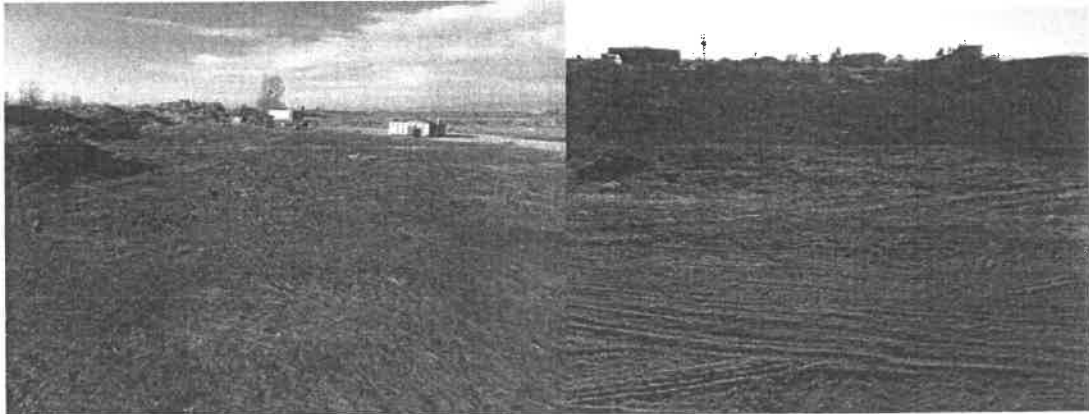


Figure 2: Metal Corners and Ash Removal

2. Remove all ash  
Original Deadline: June 30, 2019  
Requested Extension: **September 30, 2020**

**Status: In Progress.** Absmeir Landscaping has been retained to deploy heavy machinery and remove all solid waste. The receipts for solid waste removal for February 2020 were included in a previous report.

**F. Untreated Lumber:**

1. Apply for burn permit with CDPHE - June 30, 2019

**Status: Applied but denied the burn permit.** CMF applied for a burn permit with CDPHE to burn untreated wood trays, but the state does not authorize burning this type of material. The only materials that can be burned are natural woods.

2. Remove all Untreated Lumber as Permitted by CDPHE - February 28, 2020

**Status: Complete.** All untreated lumber will need to be disposed of at a landfill instead of being incinerated. CMF has employed an individual who has completed dismantling the pile of wooden trays in order to separate all wooden planks and corners so that reusable planks can be made into new trays. Absmeier Landscaping has been retained to remove all remaining solid waste at the facility. The solid waste removal receipts for February 2020 were included in a previous report.

December 4, 2019 – 42 CY of wood debris removed by Rio Grande Bentonite, INC

December 6, 2019 – 90 CY of wood debris removed by Rio Grande Bentonite, INC

**G. Treated Lumber:**

1. Remove all pallets - August 31, 2019

**Status: Complete.** CMF has been transporting pallets and broken pallets to the SLV Regional Solid Waste Authority. CMF estimates that they have removed all of the pallets that were on-site. Any pallets that are uncovered in dirt waste piles will be sent to the SLV Regional Solid Waste Authority.

June 13, 2019 – 200 broken pallets, 160 pallets removed

June 14, 2019 – 600 broken pallets removed

June 20, 2019 – 200 pallets removed

All fresh incoming pallets are stored in a designated concrete area which is shown in Figure 3.



**Figure 3: Concrete Pallet Storage Area**

2. Disposal of any other waste treated lumber – June 30, 2020

**Status: Complete.**

#### H. Plastics:

1. Dispose of all plastics laying on ground (totes, plastic bags, etc) - August 31, 2019

**Status: Complete.** As CMF picks up debris around the facility, plastics are being cleaned up. All small pieces of trash have been placed in roll-offs for reoccurring trash pickup with Waste Management-Monte Vista.

2. Dispose of plastics buried in piles of dirt and debris – September 30, 2020

**Status: In Progress.** CMF has retained Absmeier Landscaping to remove all solid waste at the facility. Heavy equipment has been deployed to break down the piles of debris, and the waste removal receipts for February 2020 were included in a previous report.

#### I. Twine:

1. Remove twine that is scattered around the facility - August 31, 2019

**Status: Complete.** All the easily accessible twine has been collected in roll off totes for at the SLV Regional Solid Waste Authority.

2. Remove all twine that is buried in piles of dirt and debris – September 30, 2020

**Status: In Progress.** CMF has retained Absmeier Landscaping to remove all solid waste at the facility. Heavy equipment has been deployed to break down the piles of debris, and the waste removal receipts for February 2020 were included in previous reports.

February 13, 2020 – 1.18 tons of twine removed

#### J. Metals:

1. Dispose of all metal corners from historical burning of pallets - July 31, 2019

**Status: Complete.** The metal corners have been collected in provided roll-offs and were disposed of by the Rio Grande Bentonite Inc American Trash and Rolloff Service. The receipts for metal corner disposal were included in a previous report.

2. Organize or dispose of all scrap metal  
Original Deadline: October 31, 2019  
Extended Deadline: September 30, 2020

**Status: In Progress.** CMF has begun organizing scrap metal and machine parts and placed in the machine shops. Anything that is not useable is also being collected and will be disposed of. Refer to Figure 4 which shows scrap metal removal on site.



**Figure 4: Scrap Metal Removal**

**K. Other Materials (I.E. cardboard, tile, rubber belting, rusty pipe, etc.)**

1. Dispose of all miscellaneous materials at the San Luis Regional Landfill - July 31, 2019

**Status: Complete.** All easily accessible debris have been collected and disposed of. All miscellaneous materials that are uncovered when the sediment piles are leveled will be disposed of at the SLV landfill.

**Summary of Progress**

CMF has been responsive in following through with the completion of the indicated solid waste action plan items. They are currently on hold to remove ash and piles of sediment due to winter conditions at the facility. They are consistently cleaning up loose debris around the facility in standard Waste Management roll-offs that are picked up weekly.

On July 29, 2019 a conference call was held with CMF, Element, and the State to discuss the progress, fines, and a possible Supplemental Environmental Project (SEP) for the solid waste compliance order. CMF has decided to pursue a SEP, but Element will not be involved in this process. A SEP application was submitted by CMF but was not considered to fall within the guidelines of an approved SEP project, and therefore this application was rejected by the State.

A Final Compliance Order on Consent for CMF, LLC which included an Administrative Penalty, was sent to CMF on October 7, 2019.

CMF and Element held a meeting on December 13, 2019 and discussed the final outstanding action items for CMF to complete which include:

1. Contact CDPHE Air Pollution Control Division regarding the on-site incineration of used oil
2. Coordinate and complete soil sampling of stained soils
  - a. Coordination with a sampling company can take place at this time, but sampling will need to wait until the spring or summer when the ground is no longer frozen

CMF retained Absmeier Landscaping to deploy heavy machinery to remove the mounds of solid waste. CMF expects this to be completed in the next couple of weeks. The waste removal receipts for February 2020 are included at the end of this report. This waste removal is as follows:

February 19, 2020 – loads of 3.92, 4.98, 3.15, 2.94, 4.10, 6.96, 3.29, and 5.05 tons of construction waste

February 20, 2020 – 5.17, 4.98, 5.06, 4.23, 4.85, 4.10, 5.84, 5.82, and 8.40 tons of construction waste



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Nicholaus P. Marcotte, P.E.  
Element Engineering, LLC.  
Colorado Mushroom Farm Engineer

6/11/20

Date