

limit when this limit goes into effect in 2022.

The minimum capital upgrade cost for the currently available state-of-the-

art equipment that could remove the maximum amount of TN possible is \$15 million. The current value of the entire Tri-Lakes facility, including the land and

all the buildings, is \$6 million.

Furthermore, there are exceptions in Reg. 31 that would allow the 2.1 ppm limit to become effective as early as 2017 if changes are made in the next Arkansas River basin hearings regarding the existing impaired water classifications for Monument Creek.

The actual chemistry and biological uptake of total phosphorus and total nitrogen in aquatic ecosystems is quite complicated and not well understood, particularly the relationship between total nitrogen and algal growth.

This TN cost estimate does not include inflation over the next 10 years. Nor does it include the separate additional short-term cost of about \$2 million for new equipment to treat total phosphorus (TP) to meet the new Reg. 85 discharge permit limit of 1 ppm, which will become effective in 2017.

The EPA has stated that it would prefer that the state immediately approve its warm water nutrient criteria—0.067 ppm for TP and 0.88 ppm for TN—but has not yet made these criteria a federal requirement or a mandate on the state. Neither of these EPA interim nutrient values can be achieved by any existing technology.

For more information on this issue, see:

- [www.ocn.me/v12n7.htm#juc](http://www.ocn.me/v12n7.htm#juc)
- [www.ocn.me/v12n7.htm#msd](http://www.ocn.me/v12n7.htm#msd)
- [www.ocn.me/v12n6.htm#juc](http://www.ocn.me/v12n6.htm#juc)

- [www.ocn.me/v12n6.htm#msd](http://www.ocn.me/v12n6.htm#msd)
- [www.ocn.me/v12n5.htm#juc](http://www.ocn.me/v12n5.htm#juc)
- [www.ocn.me/v12n5.htm#msd](http://www.ocn.me/v12n5.htm#msd)
- [www.ocn.me/v12n4.htm#cwqcc](http://www.ocn.me/v12n4.htm#cwqcc)
- [www.ocn.me/v12n3.htm#nutrients](http://www.ocn.me/v12n3.htm#nutrients)
- [www.ocn.me/v12n2.htm#juc](http://www.ocn.me/v12n2.htm#juc)

The average hydraulic flow in May was 29 percent of the facility's rated capacity of 4.2 million gallons per day. The average solid waste flow through the plant was 48 percent of the maximum organic treatment capacity of 5,600 pounds per day.

Monument had one very high influent copper reading of 380 parts per billion (ppb) in the south Monument vault. However, the average concentration of copper in the Monument's influent for May in the south Monument vault was 131 ppb. The average concentration in the Tri-Lakes facility's discharged effluent after treatment to remove copper was 7.5 ppb, well below the current discharge permit's limit of 24.8 ppb. The maximum copper concentration in facility effluent during May was 8 ppb, well below the current maximum copper limit of 36.4 ppb. Burks noted that, in contrast, the copper limit for drinking water is 1,300 ppb. However, some forms of aquatic life in warm streams may be more sensitive to copper, but the existing data are not definitive.

Wicklund reminded the JUC that the most likely source for the infrequent spiked copper readings that occur in all three owner district collection systems is



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