

Background: The Tri-Lakes facility has been extremely vulnerable to violations of the copper limits in the previous and current discharge permits over the past decade due to the aggressive nature of Town of Monument groundwater, which leaches copper from the inside of potable water lines. The plant's activated sludge treatment process installed in 1998 was never intended to nor expected to remove copper. No copper limitations existed or were planned when the plant was constructed in 1998. No affordable treatment option is available that would meet these pending 2016 copper permit limits in the facility's current discharge permit.

All three owner districts banned the installation of copper water pipes after the Town of Monument terminated caustic soda injection into its drinking water to control pH and line the interior of copper water pipes to help prevent leaching. The districts also banned the use of copper sulfate for killing tree roots in property owners' sewer service lines. The Tri-Lakes facility's activated sludge treatment process is vulnerable to the large slugs of copper in root-killing products that are little more than large jars of copper sulfate. The extended time it takes for the plant to mitigate slugs of copper can cause permit violations and expensive fines from the state and EPA, up to \$25,000 per day.

The Tri-Lakes facility is operating under a temporary modification of its copper limits. These require a maximum average concentration of 24.8 micrograms per liter ($\mu\text{g/l}$) and a maximum individual test concentration of 36.4 $\mu\text{g/l}$. This modification in the current discharge permit expires at the end of 2015. The new copper limits in 2016 for the current discharge permit would be lowered to an unattainable maximum average of 9.8 $\mu\text{g/l}$ and a maximum individual test reading of 15.0 $\mu\text{g/l}$.

On June 11, the Water Quality Control Commission formally approved Tri-Lakes' request for site-specific dissolved copper standards of 17.4 $\mu\text{g/l}$ on average and a peak of 28.4 $\mu\text{g/l}$ on the sub-segment of Monument Creek from immediately above the discharge of the Tri-Lakes facility down to the North Gate Boulevard Bridge (Exit 156 on I-25.) This recommendation was based on nearly a decade of studies for Tri-Lakes by the environmental firm GEI Consulting Inc. The cost over the past decade for developing this new copper evaluation procedure was about \$500,000.

GEI created a biotic ligand model to evaluate fish absorption of copper at various stream concentrations as well as a fixed monitoring benchmark statisti-

cal analysis of copper concentrations in fish gills, in accordance with EPA's 2012 guidance document. This is the first fixed monitoring benchmark standard that has ever been approved by the EPA and sets a national precedent.

On June 11 the commission also formally approved new site-specific discharge permit limits for copper—16 $\mu\text{g/l}$ (average) and 25 $\mu\text{g/l}$ (peak)—for the rest of current Tri-Lakes' permit period, through

2016. This is the best performance that the plant can currently be reasonably expected to achieve. The savings to the constituents of the Tri-Lakes facility are incalculable because no biological nutrient removal technology exists for meeting the copper standards that would be imposed on Jan. 1, 2016, under the current permit.

Actual in-stream concentrations below the mixing zone will be much less than either the new Monument Creek seg-

ment standards or new Tri-Lakes effluent standards just approved by the commission, because the effluent copper is diluted by the essentially copper-free Monument Creek flows coming from Monument Lake, immediately upstream of the Tri-Lakes facility discharge location just south of Arnold Avenue.

Foster told the JUC that the Tri-Lakes facility's victory at the commission's basin standards review hearing in June

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