Whitelaw said that the Monument Hill Country Club had blamed Woodmoor in a Gazette article for having to close its golf course operations due to the high water cost. He said, "There is more to the story but I'm not going to go into it today, a lot more on our side."

Note: Club owner Tri-Lakes Golf LLC also told the Gazette that closing the golf course will not affect any other club facilities, which include indoor tennis, indoor and outdoor aquatics, a two-story fitness facility, and dining services. The club is located at 18945 Pebble Beach Way, off of the northeast end of Woodmoor Drive. Tri-Lakes Golf LLC bought Monument Hill Country Club, formerly Woodmoor Pines Golf and Country Club, out of receivership in 2010. (www.gazette.com/articles/club-151625-owners-elsewhere.html)

Plant manager's report

Burks stated that the facility's January discharge monitoring report inadvertently did not include the "monitor only" measurement for nonylphenols, organic compounds found in many detergents. The effluent samples sent to the SGS Mineral Services lab had exceeded the holding times, and the lab could not perform a valid retest. The preliminary SGS lab report for February shows that nonylphenols were undetectable. There are no requirements for the facility to treat nonylphenols.

Hazardous nonylphenols usually come from dry cleaner discharges and will not be an issue if they remain nondetectable. There are three dry cleaners in the Woodmoor district, and none in the Monument and Palmer Lake districts. Nonylphenol pretreatment discharge prohibitions could be imposed if a future facility discharge permit limit is added and is too restrictive to be attainable.

The total nitrate nitrogen concentration for January was 9.6 milligrams (mg) per liter

(l). The facility's permit limit is 23 mg/l. The total inorganic nitrogen concentration was 10.3 mg/l versus the permit limit of 23 mg/l.

Burks noted that these two nitrogen test results were disappointingly high because the plant's bacteria had stopped consuming oxygen for a while, which has never happened before. There had been a strange color and higher concentration of microorganisms in the top layer of the sludge lagoon, perhaps caused by a load of oxidizer in the wastewater or extremely cold temperatures.

The influent wastewater turbidity had been over four times higher than normal as well, perhaps also due to extremely low temperatures. It takes several days to correct these unpredictable biological "upsets" that typically have causes that cannot be precisely determined, but have often resulted from cold weather rather than pollutants. These upsets can cause permit violations that are completely beyond the control of the operators.

In treatment plants like Tri-Lakes that use biological nutrient removal, certain types of aerobic bacteria consume the organic nitrogen in the presence of oxygen from air pumped into the aeration basin by large blowers during the nitrification cycle. However, these aerobic bacteria are sensitive to environmental conditions. During denitrification, other anaerobic bacteria reduce nitrates to nitric oxide, nitrous oxide, and nitrogen gas without the use of oxygen--while the blowers are turned off to limit the amount of oxygen that is dissolved in the wastewater.

Total inorganic nitrogen (TIN) consists of ammonia, nitrates, and nitrites. This TIN value is added to total organic nitrogen to yield a total nitrogen (TN) value. Another nitrogen value that is often used in lab reports, but not for discharge

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permit limits, is total Kjehldahl nitrogen (TKN), which is total organic nitrogen plus ammonia.

proposed interim value for total nitrogen for warm streams is 2.01 mg/l. This limit in Regulation 31.17 will become effective on May 31, 2017. This limit is unattainable by the current design of the Tri-Lakes facility. The total nitrogen reading for the plant's treated effluent for January was 5.35 mg/l. Very specific and expensive plant modifications will be required to meet this new total nitrogen removal requirement.

Similar but separate very expensive plant modifications will also have to be made to try to meet a total phosphorus limit of $0.17 \mu g/l$ in 2022. The total phosphorus reading for the plant's treated effluent for January was 5.4 mg/l, about 32,000 times higher than the new limit. For more information on state nutrient limits, see page 66 of Regulation 31 at: www.colorado.gov/cs/ Satellite?blobcol=urldata&blob headername1=Content-Dispositi on&blobheadername2=Content-Type&blobheadervalue1=inline %3B+filename%3D%22Regulat ion+31+.pdf%22&blobheaderval ue2=application%2Fpdf&blobke y=id&blobtable=MungoBlobs& blobwhere=1251849445870&ssb inary=true

The potentially dissolved copper average for January was

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8.5 micrograms (µg) per liter. The temporary modification to the permit limit for the average is 24.8 µg/l. The maximum copper reading was 9 µg/l. The permit limit for the peak value is 36.4 µg/l. These two limits in the current temporary modification to the copper limits expire at the end of 2013. In 2014, these limits are scheduled to change to an average of 9.7 µg/l and a peak of 15 µg/l. The plant would currently not be able to achieve these values several times per year.

At the Water Quality Control Commission hearing on June 10, the Tri-Lakes facility will

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