

chemicals may negatively affect the chemical composition of the biosolid sludge that is currently being treated at very low cost for 27 months in the existing facility sludge lagoon. This treated sludge can now be directly applied to agricultural fields as fertilizer. The new chemical phosphate treatment will cause changes in metals concentrations and the bio-availability of phosphorus in the treated sludge that will prevent its use as agricultural fertilizer. Treated biosolids will have to be disposed of on a continuous basis at a landfill at much greater expense when chemical removal of phosphate begins. The proposed Phase 2 expansion would provide for this continuous biosolid waste disposal equipment expansion.

New phosphate treatment costs rise another \$863,000

Tamburini announced two new requirements that further increased the original proposed cost of \$1 million for phosphate treatment from \$2.007 million to \$2.87 million. To meet future nutrient restrictions, continuous aeration will now be required instead of the alternating aerobic/anaerobic cycles currently used to create nitrification and denitrification in the two operating aeration basins.

This new restriction will require two new unforeseen expensive capital costs in the first phase of facility expansion. A backup generator system will have to be installed at an additional cost of about \$600,000 to ensure constant aeration during a power failure.

The facility's third aeration basin and secondary clarifier have never been used or needed. The south aeration basin will now have to be activated to meet the planned higher continuous aeration demand. A new blower with

advanced frictionless magnetic bearing technology will be needed to provide more air flow as well as a new, more precise automated air flow control system. New ammonia and nitrate analyzers that will operate continuously will also be required to more tightly control biological waste digestion in all three aeration basins. These new components will cost an additional \$263,000.

Some of the other planning items briefed to the JUC on Aug. 12 were:

- The Tri-Lakes current monthly permit limits for copper negotiated in 2013 with the Water Quality Control Commission at the Arkansas River basin hearing, 16 micrograms per liter (µg/l) on average and 25 µg/l maximum, will still be cut to 9.8 µg/l average and 15 µg/l daily maximum by the current discharge permit in 2015.
- Tri-Lakes applied for a new permit at the direction of Foster to protect the higher permits that cost \$500,000 in research and legal fees to gain EPA approval.
- The existing plant can already meet all the permit limits for metals that are expected to be imposed by the EPA through 2034.
- Average annual flow will grow to 1.81 MGD in 2034, with a maximum month of 3.23 MGD.
- Average annual organic biosolids loading will grow to 3,602 pounds per day, with a maximum month of 5,013 pounds/day.
- Nitrogen treatment capacity will become more important in the future than organic biosolids treatment capacity, with the EPA requiring installation of "limits of technology" treatment equipment regardless of cost.
- The EPA has passed new national ammonia discharge limits—varying month to month between 10 mg/l and 16 mg/l—that become effective in the current facility discharge permit in July 2016.
- These variable EPA ammonia discharge limits will be cut in half in 2024 and may become an issue for Tri-Lakes.
- Denver marijuana grow facilities have already been shown to discharge a substantial amount of ammonia.
- Average annual ammonia loading will grow to 459 pounds per day with a maximum month of 544 pounds/day in 2034.
- The state lowered the in-stream limit for the organic compound called 1,4 dioxane—a stabilizer for industrial solvents that is also an impurity in anti-freeze deodorants, shampoos, and cosmetics—from 3.2 µg/l to 0.35 µg/l last year.

- A 1,4 dioxane discharge limit will likely appear in the next Tri-Lakes discharge permit.
- There will also be new discharge limits for nonyl-phenols, trihalomethanes, and haloacetic acids, even though they are currently being effectively removed by the Tri-Lakes activated sludge system as already shown by monthly "nondetect" reports in discharge monitoring reports.
- The new Phase 1 phosphate clarifier, flocculation basin, chemical storage building, and new driveway will be installed on vacant facility land south of the south aeration basin.
- The final planning document is scheduled to be completed in September.
- The final design will be completed for bidding in

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