

attended. TLWWTF operates as a separate public utility and is jointly owned, in equal one-third shares, by Monument Sanitation District (MSD), Palmer Lake Sanitation District (PLSD), and Woodmoor Water and Sanitation District (WWSD). The three-member JUC acts as the board of the facility and consists of one member from each of the three owner districts' boards.

Background: The \$3.42 million construction costs for the new total phosphorus tertiary chemical treatment clarifier expansion and supporting infrastructure are being shared this way: MSD—19.79 percent, PLSD—33.33 percent, and WWSD—46.88 percent. These percentages are the subject of a pending lawsuit that WWSD has filed against MSD and PLSD over how the cost of construction will be shared.

WWSD's position is that these costs should be divided by thirds.

PLSD had originally agreed to pay a third of the costs.

MSD's position is that each district should pay the same percentage of the cost of this expansion according to the amount of currently owned treatment capacity for flows and biosolid wastes in accordance with TLWWTF's Joint Use of Facilities Agreement (JUA) rules for treatment constituent expansions: WWSD—64.28 percent, MSD—19.79 percent, and PLSD—15.93 percent

MSD's position is also that each district should own those same percentages of the new chemical total phosphorus treatment capacity that is being created with new equipment in accordance with the Tri-Lakes JUA rules for treatment constituent expansions and that district reimbursements from the \$1 million state nutrient design and construction grant should also be divided by these same percentages. See www.ocn.me/v15n5.htm#tlfjuc0414 and www.ocn.me/v15n2.htm#tlfjuc0113 for additional background.

Phosphorus levels high; testing schedule discussed

Facility Manager Bill Burks reported the August total phosphorus influent test result from each district into the TLWWTF. The total phosphorus concentration (mg/l) and pounds per day (ppd) for MSD for August were almost twice as high as in previous months this year, Burks said. Flow in millions of gallons per day (MGD), total phosphorus concentration (mg/l), pounds per day (loading) and percent of phosphorus contribution for August were:

- MSD — .207 MGD, 34.0 mg/l, 58.7 ppd, 51 percent
- PLSD — .225 MGD, 6.8 mg/l, 12.8 ppd, 11 percent
- WWSD — .876 MGD, 8.8 and 4.0 mg/l (North and South Woodmoor), 43.4 ppd, 38 percent

Wicklund said Monument's numbers since January had been high, and he planned to talk to industrial and commercial businesses in MSD about "best practices" that reduce the amount of phosphorus they contributed to the wastewater influent into the plant.

The August MSD numbers, which were higher than expected, generated a

discussion about the current once-a-month phosphorus test. Wicklund said the JUC had anticipated that phosphorus levels would track with each district's pounds of influent biosolids and would eventually use those biosolids numbers for billing on phosphorus treatment too, but since indications were that total phosphorus was not tracking with biosolids, testing more than once a month was needed. He said that the increased cost of testing would be worth it to make phosphorus operational cost sharing fair. He asked the JUC to approve phosphorus testing at same frequency as biosolids testing, which is done 12 times a month.

Wicklund said the MSD board had discussed the fact that more frequent phosphorus testing would reduce the possibility of an outlier reading incorrectly representing the whole month's levels for any one of the three districts. One composite sample in one day might not be representative of the district's influent wastewater for the whole month, he said.

He anticipated that cost sharing for chemicals and electricity used in new total phosphorus tertiary chemical treatment clarifier currently scheduled to start next summer would be based on the phosphorus testing for each district. The cost of operating the new phosphorus treatment clarifier next year would be far larger than the small costs of sampling and testing, he said. "Does Palmer Lake want to pay a third of the chemical costs for this when it's only contributing 14 percent? We have to do something to make the billing fair for each district... We are not just going to be splitting the costs of operating that phosphorus treatment by thirds," Wick-

lund said. Shaffer disagreed with Wicklund, saying that a single data point should not result in spending so much extra money on testing immediately. He also said that the current phosphorus monitoring was supposed to just be an indicator, not a way to assess future operating costs or split-outs on capacity.

Burks said that the issue of billing for chemicals and electricity for phosphorus removal had not yet been discussed or decided by the JUC.

Shaffer said it was premature to talk about billing now, and that it would be decided when differences between the member districts were settled in January or February, after the lawsuit was over.

Wicklund disagreed that the billing question would be solved by the lawsuit, since those results would determine ownership percentage in paying for construction of the new total phosphorus tertiary chemical treatment clarifier. The lawsuit did not have anything to do with operating costs, such as treatment issues, which are addressed in the Joint Use Agreement, he said.

Burks suggested that once the phosphorus removal process actually begins next May, sampling of actual amounts will automatically occur three times a week. The committee voted unanimously to continue testing phosphorus levels once a month for now, but once the clarifier starts operating, the testing will be done more frequently.

Construction going smoothly
Tetra Tech engineer Steve Tamburini presented a report on progress by Aslan Corp. on the new total phosphorus tertiary chemical treatment clarifier. The total budget for the project is \$3.642 million, and construction was progressing on or ahead of schedule for the first five months of work, Tamburini said.

Note: The existing TLWWTF has no designed capability for removing total phosphorus, because there was not a requirement for treating this constituent until the state's approval of Health Department Control Regulation 85 in June 2012. The facility already meets the Control Regulation 85 total inorganic nitrogen (TIN) November 2019 limit of 15 mg/l. TLWWTF must comply with the new 1 mg/l running annual median total phosphorus limit listed in Control Regulation 85 starting on Nov. 1, 2019 under the facility's new five-year discharge permit that took effect on May 1. The new phosphorus treatment clarifier is designed to comply with this TIN limit and will start compliance testing in mid-2016.

Tamburini said construction so far has proceeded with a temporary building permit, which will expire soon. The final building permit will not be issued by the Pikes Peak Regional Building Department until the plans include a backup electrical generator for the ventilation and temperature control in the chemical storage area, which is classified H4 since it stores large amounts of non-flammable chemicals commonly used in both water and sanita-

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