

BARRU HOMES INC.

P.O. BOX 368 - - - GRAND JUNCTION, COLORADO 81501
OFFICE ADDRESS 728 South 10th Street • PHONE 303 - 245-4114

file under Sewer.

*W E.
M.*

May 5, 1978

The Honorable Richard Lamm
136 State Capitol Building
Denver, Colorado 80201

Dear Governor Lamm:

During the breakfast meeting which you hosted for the Colorado Homebuilders at the mansion on Friday, April 7th, the issue of delays occasioned by the Water Quality Control Commission to the Sewer Plant Development in Mesa County was brought to your attention and you asked for documentation of this delay. The enclosed chronology is an attempt to document direct and indirect delays. I will attempt to proceed in an outlined form.

- I. Public Law 92-500 with it's Section 201 requiring an areawide management plan was passed in 1972 just at the time the Valley Wide Sewer Committee began the process of planning for the Grand Valley's future with a unified sewer system. At that time, a three step program for planning and development became the approved standard.
 - A. An application for a Step 1 grant was submitted in 1972 and received in the spring of 1974.
 - B. A contract was entered into on May 8, 1974 for development of an areawide facilities plan and such a plan was completed in September, 1975.
- II. Based on this areawide facilities plan, a Step 2 grant was applied for April 6, 1976.
 - A. Because of perceived inadequacies in the areawide facilities plan, the Step 2 grant was divided into two phases.
 - B. Phase 1 was termed a pre-design report which was to respond to two specific issues:
 1. A National Wildlife Federation request for a full EIS based upon the concern for the impact of ammonia in the discharge on endangered species in the Colorado River. This concern originated with the original proposal which called for only secondary treatment. To avoid full EIS, the City of Grand Junction made an unqualified agreement to go to tertiary treatment if a specific study showed that such danger did in fact exist. This agreement still exists and the City has full intention to honor it as required.

It was the City's understanding that EPA would conduct this study concurrently with the second section of the Phase 1, Step 2 study which was to be conducted by Grand Junction. To date, this study has not even been begun by EPA, though they continue to indicate that this will not, in any way, delay process on Phase 2 of the Step 2 grant.

2. The second part of the Phase 1 study was further and more detailed investigation of land application as an alternative method of waste water disposal. Some members of the Water Quality Control Commission felt this approach was not properly considered in the Step 1 study. The City of Grand Junction agreed to undertake this. This study, which was complete on August 7, 1977, was presented to the Water Quality Control Commission with a request for hearing and action during the September, 1977 meeting. At the Water Quality Executive Committee meeting prior to the full Commission meeting, a delay until the October meeting was requested by members and staff for adequate study time. At the October meeting, the staff raised many questions concerning the study.
 - a.) Specifically, the City concluded that the land application was not the preferred plan because of increased costs and delays in what was already an impossibly tight time frame occasioned by increasing development pressures. The City, however, agreed that land application was an alternative that could be pursued in the future after a plant was on stream.
 - b.) The Commission and staff raised some very specific questions concerning the City's position on land application. They wanted these addressed in a more complete manner than in the report submitted for the October meeting.
 - c.) To be as thorough as possible in providing answers and to avoid future delays, the City did not meet the November meeting deadline, but submitted a response with a cover letter from Mayor Lawrence Kozisek dated December 1, 1977 (copy enclosed marked A) requesting review and action during the December meeting.
 - d.) Despite this request, at the December meeting the staff and some members of the Commission acted as if they did not know they were being asked for action. Despite this, a motion was made for approval of the report and failed.
 - e.) Final approval came for the proposal at the January 4th meeting of the Water Quality Control Commission. The motion carried an authorization for Ruth M. Wright to write a letter to the City of Grand Junction stating the Commission's (and particularly a small vocal minority) concern that the City continue to pursue land application as an alternative method (a commitment the City had already made). The letter was duly drafted by Mrs. Wright, but sent out over the signature of Mr. Evan D. Dildine, Technical Secretary (copy enclosed marked B). I question the appropriateness of this method of transmission as such a letter gave the appearance of a unanimous position of displeasure by Commission and staff on the issue, which was hardly the case.

3. At this point, the City had every reason to believe that there would be a simple submittal of approval and a request for timely processing by EPA. However, without prior approval of the Commission (as far as the public knew) Mrs. Wright proceeded to draft a letter to EPA virtually assuring a slow down and delay in EPA processing. Furthermore, by having Mr. Dildine sign this letter also, it gave credence to full Commission and staff support to the questions raised. It also implied a serious breach of ethics on the part of the Grand Junction staff and administration (copy of letter enclosed marked C).

As a result of this letter (and possibly other actions we may not be aware of), the technical staff of EPA, though basically committed to the issuance of a negative letter has now reraised many questions that were answered previously. This has served to further slow down the process.

I feel the letter to Mr. Merson was totally inappropriate, written, as it was, by the wife of an engineer who is one of the State's leading proponents of the land application method. Furthermore, I feel it reflected a factually inaccurate picture of both the Commission's position and the actual considerations and consequences at stake. Furthermore, it totally ignores Grand Junction's willingness to pursue land application as an alternative for discharge of treated effluent after the basic treatment plant that is needed now is in line.

Mrs. Wright is to be commended for her concern for land application as a preferred method. She is further to be commended for her concern for good land use. I share her concerns totally on both issues, as do many others in Grand Junction. But, is membership on the Water Quality Control Commission the appropriate place to pursue these positions regardless of the context and consequences?

As the energy related growth impact continues to accelerate in our Valley, this kind of short-sightedness on the part of people who are dogmatic in their approaches beyond the point of reasonableness and prudence merits your careful attention, and hopefully, interference on our behalf.

Mr. Merson has indicated to a member of your cabinet, Ms. Paula Herzmark, that there are no apparent problems on this grant application, and as far as he knows, it is proceeding smoothly. We believe this to be the case and ultimately it will be approved. Yet, because of the above letter, four months have passed and still no EPA letter. The closest thing to action is a letter allowing preliminary work on Step 2, Phase 2 up to 15% of anticipated total expenditures.

I ask your influence to help Grand Junction obtain expedited processing and the needed grant so as to assure sewer capacity in a timely manner. Thank you for interest and anticipated assistance.

Very truly yours,

Paul S. Barru

PSB/ekj



A

City of Grand Junction, Colorado

December 1, 1977

Mr. Evan Dildyne
Technical Secretary
Water Quality Control Commission
4210 East 11th Avenue
Denver, Colorado 80220

RE: Request to Proceed with Final Design.

Dear Mr. Dildyne:

In response to a resolution passed by the Water Quality Control Commission in their July 6, 1976 meeting, which informed the City and Mesa County, that they regarded the treatment of land application by the Mesa County 201 plan as inadequate and superficial. It also noted that the Commission will require that the full provision for assessment of waste water land treatment alternatives be in evidence prior to any consideration for approval of a permanent site plan.

We proceeded to fully address the question of land treatment and have been involved in a series of studies and public hearings since that time to fully address the land application method of waste water disposal.

The Environmental Protection Agency allowed the City to move into Step II or the Final Design Step E.P.A. construction Grand Program in November 1976; however, they set our program up in such a way that the Step II program was to be completed in two phases. The first phase was to consist of a study of the land application alternatives. Phase II was to consist of final design of the treatment works. E.P.A. also stated that the City "is not to proceed with Phase II until the Colorado Water Quality Control Commission approves the completed portion of the Phase I related to the treatment plant".

The City and County retained the services of Henningson, Durham and Richardson in conjunction with the engineering firm of Culp-Wessner and Culp to prepare a study of the land application alternatives.

On several different occasions HDR and others have presented their studies to the Valley Wide Sewer Advisory Committee. After several meetings of discussion this committee approved the plan outlined in the supplement to the Predesign Report as described as Alternate 5.

The Mesa County Planning Commission, the Mesa County Board of County Commissioners, and the City Council of the City of Grand Junction all held public hearings on all of the alternatives being considered. These groups after serious consideration have all passed resolutions recommending the plan as outlined in Alternate 5 in the Supplement Report.

City of Grand Junction 250 N. Fifth St. Grand Junction, Colorado 81501

303/243-2633

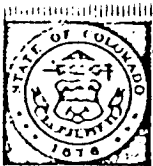
Having completed all local input, we will appear before the commission on December 6, 1977 to ask that you accept our studies regarding land application of waste water and approve the Phase I part of the design phase. Also allow the City and County to move into Phase II of the design Step II which is final design of the project under the alternate expressed as number 5 in the supplement to the pre-design report.

We thank you for the opportunity of the December 6 appearance and look forward to your help in solving the growing problems of our area.

Sincerely,

Lawrence Kozisek, Mayor
City of Grand Junction

LK/rs



B

COLORADO DEPARTMENT OF HEALTH

4210 EAST 11TH AVENUE • DENVER, COLORADO 80220 • PHONE 388-6111

Anthony Robbins, M.D., M.P.A. Executive Director

January 25, 1978

Mayor Lawrence Kozisek and
Members of the City Council
City of Grand Junction
Grand Junction, Colorado 81501

Ladies and Gentlemen:

At its regular meeting on January 4, 1978, the Water Quality Control Commission approved the amended 201 facilities plan for Grand Junction, thereby granting Step II design funds for the new regional wastewater treatment facility. With the approval action, however, the Commission still expressed a general dissatisfaction with the adequacy of the consideration of land treatment. It appeared that the water supply/water rights opportunities which may be available to the City with a land treatment alternative were not fully considered. Since these may be highly advantageous to the City, the Commission wishes to let you know that if your water rights attorney concludes that such opportunities do exist and should be pursued, that the Commission is still willing to accommodate the City by approving a land treatment alternative instead.

The City may wish to look into the following water supply/water rights possibility:

1. Purchase of a land treatment site by the City made up of farm lands already under irrigation.
2. The farm would be irrigated with treated sewage effluent, releasing the water formerly irrigating the land.
3. This water could be transferred to other ranchers under the project, used by the City for park/open space/golf course irrigation, or sold for industrial purposes.
4. The reason that this is potentially valuable water is that Cameo is the last major "call" on the river in Colorado, with minimal demand below Grand Junction. There may be a good market for such water upstream from Cameo.
5. Having the flexibility to sell the water up and down the Colo-

Mayor Lawrence Kozisek and
Members of the City Council
Grand Junction, Colorado
January 25, 1978
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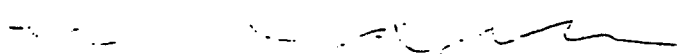
Colorado River may be far more financially advantageous than merely exchanging effluent for ditch water. The City may also be able to take credit for ditch losses, etc., avoided and therefore have a greater volume to sell.

The Commission's interest in this project, of course, is to maintain and improve the water quality of the Colorado River. It sees the land treatment alternative suggested herein as accomplishing this in two ways:

1. Reduced salinity in the Colorado River. The farm management by the City or its contractor could improve the efficiency of the water (effluent) use by different application methods, reducing seepage and runoff. In addition, since the effluent would be piped down from Grand Junction to the treatment facility and then applied directly to the land, the present seepage from the lengthy ditch delivery system from the river to the farm would be avoided.
2. Cleaner water in the Colorado River due to plant uptake and soil filtration.

If the City is interested in checking into these water supply/water rights opportunities and concludes that it wants to change the chosen alternative, the Commission would be willing to cooperate.

Sincerely yours,


Evan D. Dildine, P.E.
Technical Secretary
Water Quality Control Commission

RMW:rr



COLORADO DEPARTMENT OF HEALTH

4210 EAST 11TH AVENUE - DENVER, COLORADO 80220 - PHONE 388-6111

Anthony Robbins, M.D., M.P.A. Executive Director

January 30, 1978

Mr. Alan Merson, Regional Administrator
Region VIII
U.S. Environmental Protection Agency
1860 Lincoln Street
Denver, Colorado 80203

Re: Grand Junction 201 Facilities Plan

Dear Mr. Merson:

At its meeting on January 4, 1978, the Colorado Water Quality Control Commission approved the Grand Junction 201 Facilities Plan, thereby granting Step II design funds for a 12.5 mgd mechanical waste treatment plant. With the approval action, however, the Commission still expressed a general dissatisfaction with the plan, in particular with regard to the adequacy of the consideration of land treatment, of opportunities for salinity improvement and of general water quality improvement in the Colorado River.

1. Land treatment - It would appear that in one of the most highly productive agricultural areas of the state, a viable cost-effective land treatment alternative could be formulated. The Commission's attempts to foster such an alternative included passing a motion in July, 1976, that the original Step I was inadequate as far as land treatment was concerned, and the funding of a pre-design report was conditioned on further study with particular emphasis on land treatment. The resulting report of October, 1977, again chose a mechanical plant. The Commission felt that the report did not present sufficient detail to analyze the high costs (and therefore the non-cost-effectiveness) of the land treatment alternative, so the Commission requested additional information. These were supplied in November and December 1977 supplements. Among other things, the Commission questioned:

- a. The high cost of land: \$3500/acre would appear to include development potential, yet this land would be below a regional treatment facility. It is unlikely

that the Commission would approve a site for sewer lines, treatment facilities, or a lift station when there is plenty of developable land upstream from the plant.

b. Reservoir lining: About \$10 million is added to the land treatment alternative for reservoir lining; no demonstrated salinity or public health reasons are presented in the report.

c. Non-optimization of the land treatment alternative; for example, no credit is given for the value of water rights purchased with the land. Since the Grand Valley Canal is the major water right on this section of the Colorado River, Cameo is the last major call on the river in Colorado with only minimal demands below Grand Junction, the water rights released by applying effluent to the land could potentially have a substantial value for the City. This potential was not investigated (see attached letter to the City of Grand Junction).

2. Reduction of salinity in the Colorado River - One of the causes of the salinity is the inefficient use of irrigation water; that is, the percentage of water actually used by crops, in comparison to the amount diverted from the river, is low. A substantial portion of the water diverted seeps from canals, laterals and ditches and runs off of the surface, picking up salts and transporting them to the river. Experts say that a non-structural solution is best for the Grand Valley, but it is difficult to change traditional farm management practices of the individual farmer and ditch company. A treatment facility using several thousand acres as a land treatment site could use the practices recommended by Colorado State University, the U.S. Bureau of Reclamation, and the Soil Conservation Service for salinity control. It could be a model for private agriculture to follow. In addition, the sewage is transported to the treatment facility in pipes; after adequate treatment it can be applied directly to the land. This would reduce the former seepage losses (and hence the salinity loading) from the lengthy canal delivery system from the river to the farm.

3. General water quality improvement of the Colorado River - The chosen alternative will treat the effluent to secondary standards only which still leaves considerable amount of pollutants in the effluent, such as ammonia. Exchanges whereby effluent would be discharged into irrigation ditches was held out as a possibility,

Mr. Alan Merson.
January 30, 1978
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but it is not an integral part of the facility plan. The Commission requested that negotiations begin with the ditch companies. According to the plan report, however, the ditch companies are unwilling to take effluent at the present time.

Having held up the Step II construction grant for over a year and finding that it is extremely difficult to get a cost-effective land treatment alternative out of a municipality which is not interested in going that route, the Commission approved the plan. Another major factor was the energy-related growth pressures in the Grand Junction area, with the present treatment plant heading towards 100% capacity in the near future. However, via the attached letter, the City was advised that if, after further review, it wishes to come back to the Commission within the next few months with a project that would incorporate land treatment, the Commission would reconsider the matter.

The Commission anticipates that the EPA review process will also evaluate the Grand Junction land treatment alternatives in view of your national policy on this matter, as well as your involvement in the salinity issue on the Colorado River. We would urge that such review be expeditious as well as thorough because of the growth pressures which exist in the Grand Junction area.

Regarding land treatment in general, the Commission and the EPA have similar goals, yet due to internal and external obstacles, these goals are not being implemented. Perhaps a joint EPA/State task force should be formed to remove the real and perceived obstacles to land treatment in Colorado.

Sincerely yours,


Evan D. Dildine, P.E.
Technical Secretary
Water Quality Control Commission

RMW:rr

Attachment



MAY 3 RECD

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII
1860 LINCOLN STREET
DENVER, COLORADO 80203

RECEIVED

APR 21 A.M.

Ref: 8W-OG

APR 20 1978

DEPT. of L. A.

MEMORANDUM

TO: Ms. Paula Herzmark
Executive Director
Department of Local Affairs

SUBJECT: Status of Planning and Construction Grants
in the Grand Junction, Colorado area.

The facility plan required under Section 201 of P.L. 92-500 was completed in late 1975. EPA elected to prepare an environmental assessment and negative declaration to meet its obligations under the National Environmental Policy Act. The negative declaration was published on February 20, 1976.

The Colorado Water Quality Control Commission certified the Step 2 grant application to EPA on October 5, 1976, with the condition that the City investigate further the possibility of land application of sewage effluent. Prior to this action the Commission has approved Step 2 and 3 for Phase I of the Paradise Hill Interceptor and Step 2 for alterations to the existing plant.

The City of Grand Junction retained the engineering firm of Hemmingson, Durham, and Richardson to complete the study on land application and to design the treatment facility.

The grant offer on November 8, 1976, for Step 2 consisted of two phases. Phase I was for re-evaluation of the facility plan and pre-design including further evaluation of land application and/or sewage effluent reuse. Phase II consisted of final design, plans and specifications.

After preparation of the basic pre-design document and two supplements, the Colorado Water Quality Control Commission on January 4, 1978, approved the revised facility plan and approved proceeding with Phase II, final plans and specifications for the design of a 12.5 mgd west side plant.

The revised facility plan recommended abandonment of the existing 5.7 mgd sewage treatment plant and construction of this initial phase of the West Side Plant, located west of I-25 on the north side of the river, for secondary treatment with discharge to Persigo Wash and hence to the Colorado River. Dechlorination would be required.

EPA is proceeding with revision of the negative declaration and is expected to approve the grant increase shortly.

EPA is also contracting for a study of the Colorado River to determine what concentration of ammonia can be discharged to the River. EPA is obligated under regulation 40 CFR 6.51 (c) to protect endangered aquatic species identified primarily as the Colorado Squaw fish and the Humpback Chub in the Grand Junction area.

In the meantime the City is proceeding with preliminary design, including site surveying and subsurface soils exploration. Obtaining interim results from this study by midsummer will preclude delay in proceeding to completion of final design and completed plans and specifications.



Vencil Shively, Director
Office of Public Awareness
Region VIII