



City of Grand Junction, Colorado 81501

250 North Fifth St.,
244-1599

March 23, 1983

201 Update

Copy for Ken G
Bennett B

Ms. Pat Nelson
Permits and Enforcement
Water Quality Control Division
Colorado Dept. of Health
4210 East 11th Avenue
Denver, CO 80220

RE: City of Grand Junction, CDPS Permit No.
CO-0026417, Mesa County, Federal Grant
No. CO-80337-26-0.

Dear Ms. Nelson:

This will respond to your letter of January 18, 1983 regarding service area data, population projections, and service agreements relating to the Persigo WWTP.

We acknowledge that we are required under our grant to submit the above information. Our utilities supervisor, Ralph Sterry, is currently compiling the necessary data for the discharge permit application for Persigo, and has completed the aggregate compilations and projections.

This permit work-up will provide the core information for a comprehensive update of our 201 area monitoring and control ability, which we feel will be more than responsive to the grant requirement.

In order to conduct this 201 update the City has recently requested its consulting engineers, Henningson, Durham and Richardson, to submit a proposal. We anticipate that HDR will provide assistance on matters other than those covered by the discharge permit population/tap sections. Of course, until the scope of work is agreed upon, our requirements for a 201 update are still being defined. We are looking for recommendations on monitoring procedures, re-evaluation of population projection methods, service area mapping assistance, and other matters.

With regard to treatment plant capacity, we feel that the discharge permit information, together with updated service area maps and executed service agreements, should

be sufficient to ensure grant compliance. We will forward this information no later than May 1, 1983.

We do intend to refine our monitoring capability for each service sub-area, in order to provide an up-to-date ability to compare loading to capacity. Although your letter referred exclusively to the treatment plant capacity, our concern is also focused on the collection capacity situation, which is inherently less certain and requires more detailed and frequent analysis.

Further analysis and monitoring of collector capacity and loading should logically follow completion of the current I & I/Storm Sewer Study, as this study will identify monitoring points for the collection system components. We simply require more data collection and analysis before our monitoring capability can be established and become a meaningful management tool. This phase of the study will not be completed until the end of this year, and possibly as late as the completion of the I & I study in June of 1984.

X
As part of our comprehensive 201 area study, I am presently evaluating procedures and criteria for amendment of the 201 service area, and will be presenting recommendations to the County Commissioners within two months. Action on these recommendations will be of critical importance with regard to our ability to monitor collector loading and capacity. A report on County action will precede or accompany the collection part of our 201 update submittal.

X
The existing service agreements between the City, County, and connector entities are currently being re-evaluated from many standpoints. It is my legal opinion that they currently provide the City as plant manager/operator with adequate, albeit indirect control authority regarding both effluent quality and volume. The City is seeking additional direct enforcement authority for pre-treatment purposes, and is attempting to update the rate structures. Thus, I expect that prior to plant completion the City will have new service agreements with equal or greater overall control authority.

*ie - direct enforcement for pollution crises - instant response
- protection of 1) treatment process, 2) effluent, 3) storage quality*

To summarize, we intend to provide you with:

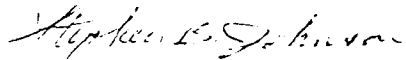
*as Manager/Operator
of the Regional Plant*

1. A basic, treatment plant-oriented update of population and service date, together with existing service agreements by May 1, 1983.
2. Revised interdepartmental monitoring procedures for collector loading/capacity, and refined population projection methods will be developed and reported by July 29, 1983.
3. An updated 201 service area map will be provided by or be submitted by July 29, 1983.

4. A report on 201 amendment procedures and criteria will also be submitted by July 29, 1983.
5. Revised connector and management agreements will be provided by prior to plant completion, hopefully before 1984.
6. A report on collector capacities and flows, and planned collector monitoring points, will be available by the end of July, 1984.

We have indeed started slowly on this project, but we intend to do it right, and in a deliberate fashion. I would appreciate hearing your suggestions and comments on this proposal.

Sincerely yours,



Stephen B. Johnson
Administrative Aide
Public Works & Utilities

SBJ/rs

cc: Tom Tayon
Ralph Sterry
Jim Patterson
Bob Jelinek