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MEMORANDUM

DATE: March 15, 1985

TO: Ralph Sterry, Utilities Superintendent/Acting
Utilities Director

FROM: Emily Whittum, Industrial Pretreatment contact

SUBJECT: Illegal Industrial Pretreated Sludge Dumped
by Coors/Cloyd at Persigo WWTP, during
February 1985.

As instructed during our meeting March 14, 1985, at the Persigo WWTP, the following is the step by step occurrence which resulted in the Persigo WWTP inadvertently receiving two (2) severe slugs of toxic waste which resulted in a non-compliance situation and violation of our NPDES Permit requirements.

Attachments #1-2 and 3 are self explanatory and should be read before continuing.

Temporary Dump Site: In May of 1984, the Persigo WWTP began accepting household septic waste at a temporary dump site.

This temporary site is awkward for the haulers and plant operators. Material dumped at this site goes directly to the inplant waste system and almost immediately enters the influent to the plant. It also causes a problem when a hauler allows the drain to clog with rags or the flow from the truck is too fast, allowing this flow to run into the street storm drain which discharges directly to the Colorado River.

This method can also create problems for the process control of the plant when inappropriate and toxic pollutants have been mixed with this waste.

Tank Haulers: A letter was sent to every tank hauler which has received a permit number from the Mesa County Health Department. (See Attachment #4), notifying them that the Persigo WWTP would begin accepting household septic tank waste on May 1, 1984.

Through the summer of 1984, inquiries from Mesa County Health Department and Waste Management of Colorado in regard to how much longer we would continue to bury sludge at the landfill; and, when would we begin accepting all tank haulers' bulk waste material?

Attachment #5 is an overview letter pertaining to these and other related questions asked by Tom Douville for us to clarify.

On February 11, 1985, Waste Management of Colorado, Inc. (See Attachment #6), placed a moratorium on all bulk liquid wastes.

On March 5, 1985, Tom Douville got this time extended by 45 days (see Attachment #7), which resulted in a meeting held by the State, County and City. (Attachment #8) on March 11, 1985.

Coors Porcelain's unexpected dumping began February 15, 1985, (8,000 gal.) and again on February 27 (10,000 gal.) when they were finally sampled, (see Attachment #2).

I personally feel that this incident was a result of the moratorium; or perhaps even, a test to see what the Persigo WWTP process could actually tolerate. This is entirely an assumption on my part. I have no direct evidence to back up this idea. However, I'm sure you can understand my suspicions because of the time frame in which it occurred.

Also, it is my contention that industrial pretreated waste, once it has been removed from the system; should never be allowed to re-enter the system for eventual re-treatment at some other point within the collection system or for final treatment at the Persigo WWTP.

Because of odor problems, which will occur, and high ground water levels at the Persigo Plant site; a more appropriate site for this treatment should be established in a more isolated area.

The Persigo WWTP will never be a suitable solution for this problem. Even the Persigo WWTP needs the assurance of being able to dispose of its non-compatible materials which it must remove for final disposal.

It is an erroneous assumption to conclude that these problems will disappear once the material is dumped at the Persigo WWTP, but rather, they will only begin.

Respectfully,



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