

February 3, 1978

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

Dear Mr. Merson:

We are in receipt of a copy of a letter to you from the State Water Quality Control Commission dated January 30, 1978. We feel that it is only fair to E.P.A., the City of Grand Junction, and to the Water Quality Control Commission to clarify some of the statements made in the letter and to include information not supplied in the letter.

From our experience with the Commission we feel sure that the letter you received was composed by one member of the Commission and represents the personal opinions of that member or at least a minority opinion of the Commission, even though the letter was signed by the technical secretary. I think the author's initials in the lower left hand corner of the last page of the letter will indicate that the letter was not composed by Mr. Dildine.

The City of Grand Junction and Mesa County, through the efforts of a consulting engineer, have just spent more than a year doing a very detailed investigation and analysis of land application as a method of sewage treatment. In addition to the work done by the engineering firm selected by a Valley Wide Sewer Advisory Committee composed of representatives of all areas of our community, we have had the benefit of many hours of study donated by a local engineer trying to show a feasible method of land application.

Our engineering study as well as three previous studies ("Master Plan", H.D.R. Inc., 1967; "Master Plan Report" Western Engineers, 1974; "Facilities Plan", N.H.P.Q., 1975) all reach the same conclusion of

constructing a mechanical treatment plant. All of the reports identify the same location for the plant. Our most recent analysis, supported by very detailed cost comparisons and analysis shows the present worth of a new mechanical plant at \$23,928,500 and land application present worth at \$40,394,000. The letter from the Commission questions the need of \$10 million in reservoir lining although in the next paragraph the need for control of salinity caused from seeping canals and ditches is stressed. Even allowing for unlined reservoirs the cost of land treatment exceeds the mechanical plant by over \$6 million. These reports and all of the supporting information have been supplied to the staff of E.P.A. and the State Health Department.

The letter says that our ". . . . municipality.... is not interested in going that route ..." (i.e. land treatment). This would indicate that the Valley Wide Sewer Advisory Committee or City staff is not interested, which is not true. In investigating land application, we were met with very little interest from the farmers for using the treated sewage water. The lack of interest was from the land owners who must agree to either use the sewage or sell their land to the City or some party who would use the sewage.

We do not have the time to work out the problems of land application even if it were cost effective. Our present plant will reach capacity in about two years. If we start design of the mechanical plant now, we can possibly have it ~~on~~ on line in two to two and a half years. We feel that it would take three to five years to implement ~~and~~ treatment.

For the past six years we have worked very hard to establish a co-operative effort between the City, the County, and developers and land owners in the area. This spirit of cooperation was based on

the fact that jointly we would provide the sewage treatment facilities that we need when we need them. If this possibility collapses at this point for any reason, the only alternative is for each entity or individual in this community to do "his own thing" and provide sewage treatment in any way he can be it septic systems, neighborhood "package plants" or whatever method he can find. I don't think this would be in the best interest of our community nor do I think it fulfills the interest of public law 92-500 of which it is the goal of the E.P.A. to administer.

Whatever assistance you can provide our community in meeting our water pollution control goals in a timely manner will be greatly appreciated.