

FEB 28 1979

Ref: 8W-06

City of Grand Junction
Mr. James Patterson, Director
of Public Works
P. O. Box 568
250 North 5th Street
Grand Junction, Colorado

Re: Federal Sewage Works Grant
L 080337 (Step 2)
Grand Junction, Colorado

(Publicly-Owned Treatment
Works Pretreatment Program
Development)

Dear Mr. Patterson:

The General Pretreatment Regulations, for Existing and New Sources of Pollution, of June 26, 1978 (40 CFR Part 403), and the Construction Grants Regulations of September 27, 1978 (40 CFR Part 35), require the development of a Pretreatment Program for Publicly-Owned Treatment Works (POTW) serving certain specified industrial dischargers. Copies of the above cited regulations are enclosed.

This letter shall serve as a notice to your City that it is required to develop a pretreatment program, pursuant to 40 CFR 403.3(a) of the pretreatment regulations. The required step-by-step development of such a program will be through an enforceable compliance schedule inserted in the NPDES permit(s) for the wastewater treatment work(s) under your jurisdiction. This compliance schedule will be inserted: (1) at the time of permit renewal; (2) to coincide with the award of construction grant funds for pretreatment program development; or, (3) upon modification of the permit, whichever occurs sooner.

Your City should apply, as soon as possible, by amendment to an existing Step 1, 2 or 3 grant, for a grant increase to cover 75% of the eligible costs of the development, of an approvable pretreatment program.

Specific areas of program development for which costs are grant eligible are as follows:

S.W.G.
Hornberg
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(1) An industrial waste survey identifying system users, the character and volume of pollutants discharged, the type of industry, the location of the industrial input, etc.;

(2) An evaluation of the legal authority, including adequacy of enabling legislation, selection of mechanisms to be used for control over industrial inputs and enforcement of categorical and prohibitive discharge standards (i.e., ordinance, contract, joint powers agreement, etc.);

(3) An evaluation of financial programs and revenue sources to ensure adequate funding to carry out the pretreatment program;

(4) A determination of the technical information (including specific requirements to prevent slug discharges and specific violations of discharge prohibitions) necessary to support development of an industrial waste ordinance or other means of enforcing pretreatment standards;

(5) Design of a monitoring enforcement program;

(6) Purchase of necessary monitoring and laboratory equipment for use by the municipal treatment works; and,

(7) Construction of facilities on public property necessary to monitor industrial wastes (e.g., control manholes, sampling ports, etc.).

Please note that grant-eligible costs are those for pretreatment program development only. Pretreatment monitoring programs are to be self-sustaining through user charges or other means upon implementation of the program. Work done prior to the effective date of the pretreatment regulations (i.e., August 25, 1978), or prior to approval by the Regional Administrator, of the change in scope and a requested grant increase to cover the proposed work, is not eligible for grant reimbursement. Also note that the requirement for development of such a program is not contingent on your being awarded a grant for this purpose. The necessity of your applying, as soon as possible, for a grant increase to your existing grant is, therefore, obvious.

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Should you have any questions regarding the pretreatment regulations or their application, please contact Mr. Jim Dunn of the Region VIII Enforcement Division at (303) 837-4901. Questions regarding the construction grants program pretreatment requirements should be directed to Mr. Gerald Burke of my staff at (303) 837-3961. Your prompt attention to this matter is requested.

Sincerely yours,

ORIGINAL SIGNED BY
WILLIAM H. HORNBERG

William H. Hornberg, P.E.
Director
Office of Grants
Water Division

Enclosures

cc: Mr. Frank J. Rozich

HDR

FEB 28 1979

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MAR 01 1979

WATER QUALITY
CONTROL DIVISION

Ref: 8W-0G

City of Grand Junction
Mr. James Patterson, Director
of Public Works
P. O. Box 968
250 North 5th Street
Grand Junction, Colorado

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C 080337 (Step 2)
Grand Junction, Colorado

(Publicly-Owned Treatment
Works Pretreatment Program
Development)

Dear Mr. Patterson:

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This letter shall serve as a notice to your City that it is required to develop a pretreatment program, pursuant to 40 CFR 403.8(a) of the pretreatment regulations. The required step-by-step development of such a program will be through an enforceable compliance schedule inserted in the NPDES permit(s) for the wastewater treatment work(s) under your jurisdiction. This compliance schedule will be inserted: (1) at the time of permit renewal; (2) to coincide with the award of construction grant funds for pretreatment program development; or, (3) upon modification of the permit, whichever occurs sooner.

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WILLIAM H. HORMBERG

William H. Hormberg, P.E.
Director
Office of Grants
Water Division

Enclosures

cc: Mr. Frank J. Rozich

HDR