



City of Grand Junction, Colorado 81501

300 North Fifth St. 303 243-2633

January 15, 1981

Mr. Ron Schuyler
Colorado Department of Health
4210 East 11th Avenue
Denver, CO 80220

Dear Ron:

The purpose of this letter is to express grave concern on behalf of Mesa County and the City of Grand Junction that current apparent delays in considering our grant application for constructing a new sewage treatment plant will have serious adverse effects legally, financially, and environmentally on our community. It is our request that our application be placed on the agenda of the February 1981 meeting of the State Water Quality Control Commission. It is our belief that state review could and should be completed without requiring further delay in considering the grant application for our project.

With Commission action in February and prompt action by the EPA in making the grant offer we could possibly accept bids on our project in April. Current bidding conditions in our area are very favorable. The two sewer projects now under construction were bid at \$400,000 below estimates. Other bids taken by the City and other local entities have reflected the same degree of competitive low bidding. The estimated cost of the new plant is about \$17.5 million. Bid differences between now and a less favorable bidding time could easily result in a cost difference of \$500,000 in our project. This not only impacts local finances but lessens the effectiveness of Colorado's share of EPA funds.

Mesa County has issued \$8 million in revenue bonds to cover the local share of the cost of building the new plant and related interceptors. It was necessary to issue those bonds in conjunction with the start of construction of the River Road Interceptor and the interim treatment plant. The amount of bonds issued was based on the estimated total cost of the project with 75% EPA funding. As a result the local share funds are in hand and are of a fixed amount. It is imperative that delays that would result in inflated costs of our project be avoided.

We understand that certain portions of our plant as designed may not be eligible for EPA funding. The use of solar assisted energy systems is not considered as innovative design and as a result is not cost effective or grant eligible. Locally, we feel that the EPA guidelines

Mr. Ron Schuyler
January 15, 1981
Page 2

for determining cost effectiveness are too conservative and that local government should demonstrate leadership in the use of solar energy. We therefore propose to use the solar assist systems even without EPA funding.

The proposed odor control equipment may not be eligible for EPA funding. We disagree that odor control equipment is not an absolute necessity at our plant. Odor problems originate in the collection system and cannot be corrected without a complete reconstruction of the entire collection system. Our new plant is not remote. There are residential and commercial areas near the new plant site. We also propose to include odor control equipment even without EPA funding.

The sludge drying beds may not be eligible for EPA funding. We were asked to develop a sludge disposal program by the state and EPA. Our program requires the utilization of both filter presses and drying beds. We do not agree that the drying beds are a duplication of process equipment and we propose to include them even without EPA funding.

If EPA funding is not available for the above items, the local share of the project could increase by about \$500,000. Funding could be available from savings realized from the current favorable bidding climate. If the project is delayed serious problems will result in meeting the local share of the cost of the project.

As you are aware, we are now under a cease and desist order because of difficulties in meeting our NPDES permit conditions. In response to the order we developed a compliance schedule for constructing the new facilities. Because of delays such as those caused by the value engineering process and EPA taking two and a half months to make a grant offer we were not able to meet the compliance schedule. The schedule was revised to coincide with a consideration of our grant by the Commission in January. Our plans were submitted to the State and EPA (Corps of Engineers) in early November. EPA review was complete in December. The State was unable to complete a review in time for the January meeting, therefore we cannot meet our revised schedule. We are hopeful of making a February meeting. I received notification on January 15 that our permit was being issued along with an administrative directive that would set a compliance schedule based on being on the February agenda. Failure to make the February agenda will result in non-compliance and violation of the discharge permit. More importantly, a delay will result in the completion of the new plant coming during the critical months when the interim plant will be at capacity and the existing plant will be at capacity, resulting in a less than desirable effluent from both facilities. This is not only a legal problem but an environmental problem.

Mr. Ron Schuyler
January 15, 1981
Page 3

There appear to be four issues concerning our project that are resulting in the apparent delay. Two of the issues, odor control equipment and drying beds have been discussed above. If the City and State cannot agree on the need of these items, the City is prepared to face the possibility of total local funding of these items. These issues should not delay this project.

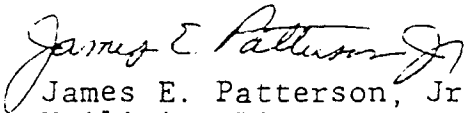
The location of the flow equalization basin in the flow process of the plant is an item that was discussed and studied in the value engineering process (a process which in itself delayed the completion of our project). To study this issue again is an added step and counterproductive to the value engineering process. This issue should not delay this project at this time.

The design of the feed process to the aeration basins was shown and reviewed in the second (75% design stage) phase of the value engineering process. The value engineering efforts, including review by State Health Department staff, did not result in design revisions. We have been in contact with Richard Bowman, District Engineer, Water Quality Control Commission, to review the plans and were able to resolve all of the problems of his concern with the exception of the flow return to the aeration basins. Minor modifications of the existing plans can resolve this problem, and we are willing to make changes as needed. This will give us the capabilities of aeration by plug flow and complete mix.

In summary, since we started this project in 1973, we have seen our community pass through a state of preparing for the immediate future to trying to survive current conditions regarding sanitary sewage treatment. With a projected completion date of 1983, a ten year period will have been required to build a sewage treatment plant. There are some serious problems with our national program aimed at protecting our water quality. More emphasis is being placed on the process than on the end result desired.

Further delay of our project should not be allowed. The impact on our community legally, financially, and environmentally caused by further delays is completely unacceptable to us.

Sincerely,


James E. Patterson, Jr.
Utilities Director

cc - William Hormberg, EPA
Grand Junction City Council
Mesa County Board of Commissioners