



City of Grand Junction, Colorado 81501

250 North Fifth St. 303 243-2633

March 13, 1981

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WATER QUALITY

D. E. _____

Mr. Arden Wallum
Permits Section
Water Quality Control Division
4210 East 11th Avenue
Denver, Colorado 80220

Dear Mr. Wallum:

Re: NPDES Permit CO-0026417 Mesa County

There are two comments and objections to the above referenced, recently issued permit which we wish to call to your attention. This response to the permit has been delayed in an effort to include consideration of the effects of certain decisions that are being made by the State Water Quality Division staff. We are still awaiting the completion of review of the plans on the new treatment plant. Decisions to be made by the State Water Quality Division staff will affect our ability to comply with the permit. Rather than delay this response any longer, we are basing these comments on the best information that we have at this time.

In the "Summary of Rationale" there are references to the dates of operation of the interim facility and to the date of completion of the new Persigo Wash Treatment Plant. There is also a reference to an Administrative Order which was issued concurrently with the permit. The Administrative Order contains a compliance schedule on which we also wish to base comments and objections.

During the preparation of this permit we were contacted regarding the above items. We were in agreement with proceeding to prepare the permit as it is now written. Subsequent to our concurrence on the above items, certain events happened over which, although we feared they could happen, we had no control. These events have had an adverse effect on our ability to comply with the above dates and time schedules.

The length of time that the interim facility will operate and the date the new plant will be completed as shown in the permit were based on the provision that Mesa County be considered for a Step III EPA grant at the January 1981 meeting of the State Water Quality Control Commission. Plans and specifications for the new treatment plant were submitted to the State Water Quality Control Division staff in early November in anticipation of being on the January Water Quality Control Commission's agenda. Even a postponement to the February agenda would not have jeopardized the ability to meet the permit conditions as written.

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We received the first verbal comments on our plans and specifications during January when we were told that there were four major problems concerning our plans. We objected to the four items as we did not agree that these items should hold up consideration of our grant. (See enclosed copy of a letter to Ron Schuyler dated January 15, 1981.) During this time there was a change in personnel among the Division staff, and a new person was assigned to our project. We then received our first written review comments indicating that there were nine items of concern and that the review was not complete. (See enclosed copy of a letter to the Mesa County Commissioners dated Feb. 13, 1981.)

We have been delayed and forced to implement changes from the design which was reviewed by the State and EPA during the design process including two value engineering reviews. Because of these delays, which to date have not been resolved, we do not know when we will be considered for our construction grant. We have tentatively been scheduled for the April Commission meeting pending acceptable design changes being made.

The earliest that the new treatment plant can be completed (provided that grant consideration be given no later than April) is September 1983. The interim plant therefore must operate through September 1983.

If delays, or elimination of a grant consideration results from changes in the federal budget or federal spending policy, it will have an impact on the completion of the new treatment plant. The impact on local finances will be quite serious in that revenue bonds in the amount of \$8 million have been issued for the local 25% share of the cost of the project.

The Administrative Order referred to above centers around a request for Step III grant for the new Persigo Wash plant in March 1981. We did not meet that date nor will we meet the compliance schedule dates that follow that date. We will not know what compliance schedule we will be able to meet until we know when we will receive consideration for a Step III grant.

The second area of concern is Part III, page 19 of 21, "Other Requirements". This section refers to the establishment of separate sewer and storm water systems.

The Grand Junction Area "201" Facilities Plan contains a separate volume specifically addressing "Infiltration and Inflow". The conclusion was drawn that separation of the existing combined sanitary sewers and storm sewers was not feasible in Grand Junction. Years later the State disagreed that the combined sewer systems should be ignored, and upon the State's request the City agreed to continue to separate the sanitary and storm sewers as economically feasible opportunities arose. In a later EPA grant, the City was required to identify and quantify the problem by June, 1981, and to submit an implementation plan for continued efforts to eliminate inflow. The implementation plan was to be submitted by October 1981.

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We understand the need to continue to eliminate as much infiltration and inflow as possible. We agreed to the grant condition that required us to try to continue to identify and quantify the problem. We have already established a program locally to eliminate certain sources of inflow. We are attempting to include some of these projects in our capital improvement programs for the next ten years. Since a large portion of our system in the older downtown area consists of combined sewer systems, it is not reasonable to expect that the people of Grand Junction will be able to finance a program to completely separate the storm and sanitary sewer systems. We do not understand how we got from a point of agreeing to continue to reduce inflow as feasible opportunities arise to the current permit conditions.

This permit requires that the problem be identified and quantified as well as an implementation plan "for achieving separate storm sewer and sanitary wastewater sewer systems". All of these items are to be completed by June 30, 1981. We have never agreed and do not agree at this time that we will achieve separate sewer systems. We do agree to continue to identify areas and separate the systems as economically feasible opportunities arise.

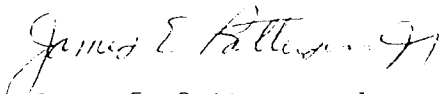
Items (1) and (3) in this section are identical to the grant requirements to which we have agreed. The wording in item (2) in the permit, however, is confusing. It is not clear if a quantification of sanitary sewerage flowing into storm sewers, or storm waters flowing into sanitary sewers is desired. We are not aware of any sanitary sewage flowing into storm sewers. Quantification of storm flows into the sanitary sewer system by June 30, 1981, could be difficult. Grand Junction receives about 9 inches of precipitation (snow and rain) per year. It is not known if enough storms will occur prior to June 30 to establish data to determine the amount of inflow from the storm sewer system.

We cannot comply with item (4) as written. We can, by October 1981, provide estimated dates for completion of plans and projected construction dates for sewer separation projects which we have identified in our five-year capital improvement projects program. No firm commitment can be made on the dates given because the City Council cannot bind future Councils to these projects.

In compliance with the permit conditions, the following persons are designated to report conditions as noted in Part II, Section A, paragraph 2a; and in Part II, Section b, paragraph 7: Jerry O'Brien, Ralph Sterry, James Patterson. These persons can be contacted at 250 North 5th Street, Grand Junction, Colorado 81501, or (303) 244-1554.

We will appreciate your consideration and response to our above concerns and comments.

Sincerely,


James E. Patterson, Jr.
Utilities Director

Enclosures

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cc - Environmental Protection Agency
Dick Bowman ✓
Ron Schuyler
Jim Wysocki
Gerald Ashby