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June 2, 1981

The Honorable Hank Brown
1319 Longworth
Office Building
Washington, D.C. 20515

Dear Congressman Brown:

Mesa County and the City of Grand Junction have diligently and persistently worked since 1973 to construct additional sewage treatment facilities for the Grand Junction area. Changes in effluent standards required by the Water Pollution Control Act Amendments of 1972 (Public Law 92-500) and the rapid growth of the area due in part to development of energy resources such as oil shale, coal and natural gas led to the recognition by local officials that the existing sewage treatment plant constructed in 1936 would not be sufficient to continue to meet the needs of the community. A projection was made that the existing plant would reach capacity in 1980. Realizing that using EPA funds was a lengthy process, City and County officials began the program to construct additional facilities in 1973 in the hopes that seven years would be sufficient lead time.

The City and County have proceeded to follow the guidelines for EPA grants and to satisfy each requirement without pause or delay by us at any point in the process. There have been many delays beyond our control. Some of the delays were legitimate, some were not. We have always been willing and able to react, adjust and modify to accept the delays as well as possible to keep the program moving. Needless to say, delays increase the cost of the project. Delays have also changed the position of the City/County from preparing for the future to trying to survive the present. The EPA grant program which is supposed to be for the protection of the environment has only delayed the construction of pollution control facilities in Grand Junction because of the continued expectation

that by completing one more step the financial ability to construct the facilities will be achieved. In reality the effluent quality from the existing plant has steadily decreased in qual

Near the end of 1980, the year that the new facilities were needed, it was projected that the new sewage treatment plant would be completed in 1983. The final plans for the new plant were submitted to the State Health Department for approval in anticipation of grant approval in February 1981. After two months during which no action was taken on the plans by the State, a review was made by the staff. Personnel changes resulted in a slower review but eventually the review was complete and changes in the plan were made to comply with the review comments.

During the review process the new administration took office in Washington, D.C. Efforts to reduce federal spending resulted in fewer EPA funds being available for sewer projects. As a result, instead of the needed \$14 million, Grand Junction was designated to receive \$10.5 million. Because Colorado Springs was eliminated from funding, they have filed suit against the State and Grand Junction stating that Colorado Springs should have received funding ahead of Grand Junction.

The day before the EPA regional office received the Grand Junction/Mesa County grant offer for approval notice was given to the EPA regional office from the EPA Administrator that all grants would have the concurrence of the Administrator prior to issuance. The Grand Junction/Mesa County grant therefore must be sent to Washington D.C. for approval.

The purpose of this letter is not to take issue with the administration's efforts to balance the federal budget, nor to comment on the future of the EPA grant program. This letter is a plea for the help from the elected representatives of the people of Grand Junction to assist the City which has become a victim of a transition process. If the City had not yet started work under a grant program or if the City was between steps in the grant process, it would be much easier to adjust to these delays and changes. Because of following the lengthy grant process, the City is now operating

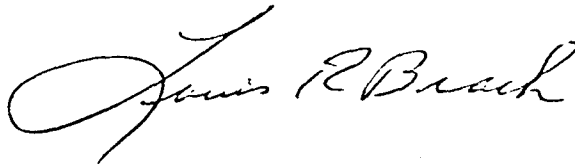
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under a cease and desist order with a compliance schedule which is impossible to meet under these conditions. Revenue bonds in the amount of \$8 million have been issued and repayment commitments made. The \$8 million is the amount needed to cover the local 25% share of the cost of the project. The people of Grand Junction have resigned themselves to higher sewer fees as their good faith effort to build the facilities. They are looking for the commitment to be met by EPA under which this program was undertaken.

Portions of the project are under construction at this time. A \$4.5 million sewer interceptor line to the new plant site has been completed. A \$2.5 million unit of the new plant is about 45% complete. At this point of financial and physical construction commitment on behalf of the people of Grand Junction and Mesa County, a lengthy delay or termination of funds would have grave consequences on this community. As a key transportation and service center of the critical energy development area of our country, one should also consider the consequences of reducing that center's ability to function.

This community appeals to your help and assistance in preventing delays or termination of a project on which we are beyond the point of no return. We feel that there is a difference between denying funds to a project which has not yet begun and bringing a project under construction to a halt.

Sincerely,



Louie Brach, Mayor
City of Grand Junction



Maxine Albers, Chairman
Mesa County Commissioners

MAIL ROOM

ALTERNATIVES CONSIDERED

Facilities plan and predesign report for this project evaluated ten basic alternatives.

A total of seven mechanical treatment alternatives were considered:

1. Construct new 6.8 mgd plant and continue operation of existing 5.7 mgd plant. Use conventional sedimentation for suspended solids removal.
2. Construct new 6.8 mgd plant and continue operation of existing 5.7 mgd plant. Use fine mesh screens for suspended solids removal.
3. Construct new 6.8 mgd plant and continue operation of existing 5.7 mgd plant. Consolidate sludge treatment at new plant.
4. Construct new 12.5 mgd plant and abandon existing plant.
5. Construct new 6.8 mgd plant and continue operation of existing 5.7 mgd plant. Provide AWT at both plants.
6. Construct new 6.8 mgd plant and continue operation of existing 5.7 mgd plant. Provide AWT at both plants and provide consolidated sludge treatment at new plant.
7. Construct new 12.5 mgd plant with AWT and consolidated sludge treatment.

Two alternatives were considered that involved treatment and reuse:

1. Construct new 12.5 mgd treatment facility utilizing aerated lagoons for secondary treatment. Abandon existing treatment plant. Effluent from new facility would be pumped and discharged to Grand Valley Canal for agricultural irrigation.
2. Construct new 6.8 mgd treatment facility utilizing aerated lagoons for secondary treatment. Existing treatment plant continues to operate. Effluent from existing plant is pumped to storage reservoir and combined with effluent from new facility. Combined effluents are pumped to Grand Valley Canal for agricultural irrigation.

The final alternative considered involved land application of wastewater effluent. This alternative involved the construction of a new 12.5 mgd treatment facility and the abandonment of the existing treatment plant. The new facility would utilize aerated lagoons for secondary treatment. Three different application sites were considered.

Based on the evaluation of capital costs and operation and maintenance costs the recommended alternative was to construct a 12.5 mgd mechanical treatment facility and the abandonment of the existing treatment plant.

The selected alternative received extensive review by the Colorado Department of Health and the US EPA and was considered to be the most cost effective solution.

Major parts of selected alternative are already under construction.
include:

River Road/Paradise Hills Interceptor Sewers - This project included approximately 6 miles of 18", 48" and 54" diameter sewer conveying wastewater to the treatment plant site. The total construction cost was \$4,400,000 and is essentially completed.

2. Interim Wastewater Treatment Plant - This project (an aerated lagoon) will serve as an interim treatment facility with a capacity of 1 mgd. Upon completion of the total plant facility, it will be incorporated as an equalization basin. The total construction cost is \$2,500,000 (45% complete).

Both of these two projects have received a 75% grant from the EPA Construction Grants Program and without completion of the total project they cannot be utilized to their full intended purpose. In addition, the City of Grand Junction is currently under a Cease and Desist Order from the Colorado Department of Health that promulgates a time schedule under which these facilities will be completed.

II. WATER QUALITY

The proposed treatment alternative is expected to contribute significantly to improving the quality of the Colorado River by accommodating projected population growth due to energy related development, consolidation of all wastewater treatment facilities in the planning area and the improved treatment capability to protect aquatic life in the receiving stream. During the project planning/design period the EPA prepared a study entitled "Ammonia Toxicity Study in the Colorado River near Grand Junction, Colorado". Based on the study, grant conditions to the City of Grand Junction call for regular monitoring of the water quality, the inference being a need for possible additional treatment facilities to protect the water quality.

III. GRANT FINANCIAL RESOURCES

The grantee has formulated a detailed financial plan for the local share of the capital construction costs and the operation and maintenance costs for the recommended alternative based on assurances from the regulatory agencies that the projects would be funded. This plan included the sale of \$8.0 million in revenue bonds the proceeds of which have already been received. The City/County has also up-dated and have made a commitment to regularly review these user charges to handle the O&M requirements of the facilities.

CHRONOLOGICAL ORDER OF EVENTS LEADING TOWARD THE EVENTUAL
CONSTRUCTION OF ADDITIONAL SEWAGE TREATMENT FACILITIES
IN GRAND JUNCTION, COLORADO

- 1973 - City sent letter to State asking that City be put on state priority list for EPA funding
- 1974 - City placed on State priority list
- May 8, 1974 - City and Consulting Engineers sign agreement for "201" study.
- December 1974 - Preliminary "201" submitted to City by consultant
- August 6, 1975 - "201" submitted to City and accepted by City
- September 12, 1975 - City and County jointly agreed to establish a Valley Wide Sewer Advisory Committee
- March 11, 1976 - First meeting of the Valley Wide Sewer Advisory Committee
- March 1976 - EPA issued negative declaration in lieu of requiring formal EIS
- April 1976 - National Wildlife Federation raises question about toxic ammonia levels in Colorado River
- June 3, 1976 - Valley Wide Sewer Advisory Committee forms consultant selection committee for new plant study
- June 1976 - City considers abandoning existing plant rather than adding advanced treatment - hopes to avoid EIS
- Water Quality Control Commission holds up site applications until City analyzes present treatment capacity and growth rates
- July 16, 1976 - Water Quality Control Commission directs City to do additional land application study
- August, 1976 - Consulting engineers selected for new plant study
- Selection begun for engineer to do pre-design study (land application study)
- September, 1976 - Engineer selected for pre-design study
- October 5, 1976 - City submits Step II grant application for new plant
- December 6, 1976 - City and County adopt resolutions outlining growth control measures
- January 1977 - Water Quality Control Commission resumes actions on site applications for Grand Junction area.
- May 11, 1977 - Valley Wide Sewer Advisory Committee advises City and County to proceed with one large mechanical treatment plant with nitrification and dechlorination and abandon existing plant
- Local engineer questions land application study; asks for 30 days to provide additional information.

- December, 1979 - Draft report on ammonia study submitted
- December, 1979 - User fee system adopted by City
- March, 1980 - I.C.R. and use ordinance adopted by City
- Second VE study on new plant
- March 14, 1980 - Plans and Specifications for Interim Plant submitted to State Water Quality Control Division
- April 7, 1980 - City receives \$3,146,250.00 Grant to construct River Road Road Interceptor Sewer
- April 18, 1980 - City submits time schedule for constructing new sewer system to State Health Dept.
- April 22, 1980 - Corps of Engineers submits review of Interim Plant plans
- May 5, 1980 - State Water Quality Control Commission approves an EPA Grant for \$2,474,250.00 to construct the Interim Treatment Plant.
- May 14, 1980 - City Receives letter from State Health Dept. stating that they anticipate approving a construction Grant for the Persigo Wash plant at the September 1980 Water Quality Control Commission meeting.
- May 20, 1980 - City opens bids on River Road Interceptor Sewer
- July 18, 1980 - City receives \$2,474,250.00 grant to construct the Interim Treatment Plant
- July 21, 1980 - City authorized by EPA to award contract to construct River Road Sewer Interceptor
- July 26, 1980 - City opens bids on Interim Treatment Plant
- October 2, 1980 - City authorized by EPA to award contract to construct Interim Treatment Plant.
- October 22, 1980 - City submits revised schedule for constructing new sewer system to State Health Dept.
- November 7, 1980 - City submits plans and specifications on Persigo Wash Plant to State for review and approval.
- December 10, 1980 - Preliminary plant of operation submitted to State Health Dept.
- December 15, 1980 - Corps of Engineers completes review of plans and specifications for Persigo Wash Plant.
- January 9, 1981 - HDR responds to Corps of Engineers review comments on Persigo Wash Plant.
- January , 1981 - State Health Dept. reports verbally. There are six major problems with Persigo Wash Plant and we probably will not make February Water Quality Control Commission Agenda.
- January 15, 1981 - City writes letter to State Health Dept. expressing concern over design review delays.

January 13, 1981 - City receives letter from State Health Dept. outlining nine problems with design and states that review is not complete.

April 6, 1981 - Water Quality Control Commission authorizes EPA Grant up to \$12 million to construct Persigo Wash Plant.

May 1, 1981 - State Health Dept. staff reports that they are writing Grant Offer for \$10.5 million to construct Persigo Wash Plant.

5/18/81

COLOKADO SPRING FILES SUIT