



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

1860 LINCOLN STREET  
DENVER, COLORADO 80295-0699

JUN 21 1983

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

*Lyle Dechant -  
Attach to Industrial  
Pretreatment Program  
Memo of 6/22/82.  
- Steve Johnson  
X 1599*

Ref: 8WM-C

Mr. James E. Patterson,  
Director of Public Utilities  
250 North Fifth Street  
Grand Junction, Colorado 81501

Re: Industrial Pretreatment Program  
Submittal; NPDES Discharge Permit  
CO-0026417

Dear Mr. Patterson:

We have received a copy of the City of Grand Junction's June 9, 1983, request for approval of the City's Industrial Pretreatment Program. Unfortunately, because the City has not yet adopted the explicit pretreatment authority contained in its proposed revisions to Article X of Chapter 25 of the municipal code, we cannot consider your submission to be complete. Although our resources normally restrict the Agency's ability to conduct a comprehensive review of submittals other than completed program applications, we intend to review your June 9, package as if it were a draft program and attempt to provide you with sufficient guidance so that approval of any subsequent application should essentially be assured. We have transmitted a copy of the package to the national Pretreatment Program Contractor, JRB Associates in McLean, Virginia, to assist us with this review.

The City of Grand Junction recently received a letter of June 9, 1983, from the State of Colorado suggesting that additional time (beyond that currently allowed in the City's above-referenced NPDES permit) for completion of the pretreatment program activities might be allowed. This letter requested the City to establish a timetable for completion and submittal of an approvable program package as soon as "reasonably possible", notwithstanding the General Pretreatment Program Regulation (40 CFR 403) deadline of July 1, 1983 for final approval. Your response to that letter will be incorporated as the new program requirement schedule.

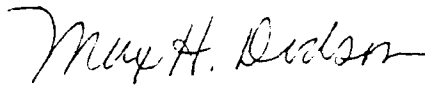
In view of the State of Colorado's June 9, 1983 letter, the City has the opportunity to fully adopt its proposed legal authority and remedy any other possible problems with Grand Junction's program prior to resubmitting its request for pretreatment program approval. Although it may take several weeks

before the contractor's review is completed and comments compiled, we anticipate that the City will be working diligently toward adoption of the proposed ordinance and improving on areas of the program where potential for such improvements have already been identified. We will attempt to provide you with any additional comments as soon as possible.

We understand through discussions with your staff that it is the intent of the City to continue to implement the pretreatment requirements to the extent possible regardless of the status of the "approval" of the City's Industrial Pretreatment Program. We commend you and are encouraged by the City of Grand Junction's attitude toward the development and implementation of its Industrial Pretreatment Program.

If you should have any questions regarding this matter, please feel free to contact Mr. Marshall Fischer of my staff, telephone 837-4901.

Sincerely yours,



Max H. Dodson  
Director  
Water Management Division

cc: Mr. Gary Broetzman, Director  
Colorado Water Quality Control Division

Mr. Cal Youngberg