



City of Grand Junction, Colorado 81501

250 North Fifth St

January 6, 1984

Box 1  
file:  
Industry  
Pretreatment.  
copy  
entire letter

Dear

On January 4, 1984, the Grand Junction City Council passed an ordinance for final publication adopting an Industrial Pretreatment Program. A copy of that ordinance and an explanatory memorandum are enclosed. The ordinance represents a milestone in the management of the regional wastewater treatment system, but it is only a step in the continuing development of an effective industrial pretreatment program.

I have previously indicated by letter of September 27, 1983 and within draft copies of the Program Report, that the existing pretreatment authority of the City as Manager/Operator of the regional wastewater plant has a limited scope. Direct enforcement authority by the Manager/Operator, however, is a requirement of both our EPA grant and State discharge permit. Since the service area of the Persigo plant encompasses multiple jurisdictions, the special Sanitation Districts, the County, and the City must cooperate to create a uniform system of parallel pretreatment authority that can be exercised by the City on behalf of all.

This goal can be accomplished if each connector District and the County now adopt by resolution a pretreatment program that incorporates or is substantially similar to the enclosed ordinance. The resolution should also authorize the City to manage and enforce the program on behalf of the  
I have enclosed a draft resolution in order to facilitate this action on your part.

Some of the existing sewer service agreements do authorize City control of industrial or other wastes, but the provisions are not sufficiently comprehensive for purposes of the new program. Following adoption of your parallel pretreatment program, a sewer service contract addendum should be executed. To provide for proper delegation to the City, I have enclosed a draft addendum for this purpose.

The City will attempt to rely primarily upon direct contractual relationships with industrial users via an industrial waste permit program. See Section 25-65 of the ordinance. However, permits alone are insufficient to provide the City

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with the legal authority necessary to manage and enforce the IP program. That is the reason that I am requesting each participating governmental jurisdiction to exercise its police powers in a uniform and cooperative manner. The ordinance does provide in Section 25-63 for representation by affected connector districts and the County in cases of appeal by an industrial user, and I can assure you that the City will closely cooperate and communicate with you in any permit enforcement actions or program alterations.

Your earliest cooperation in adopting a parallel pretreatment program, and in executing addendums delegating authority therefore, will constitute the culmination of the legal aspects of creating the pretreatment program.

Within the next thirty days, the City will seek final EPA approval of this program. I will provide you with copies of the Industrial Pretreatment program submittal at that time.

I am pleased to inform you that the new City/County Persigo Wastewater Treatment Plant is scheduled to commence operations on January 16, 1984. An NPDES discharge permit for the plant will be finally issued by the Colorado Department of Health prior to that time. I am enclosing pertinent sections of the draft permit concerning pretreatment for your further information.

Please do not hesitate to contact me at 244-1557 if you have any questions about these matters.

Very truly yours,



James E. Patterson  
Director of Public Works and Utilities

JEP/hm

cc - Gerald Ashby, Acting City Manager  
Ralph Sterry, Utilities Superintendent  
Gordon Tiffany, County Administrator  
Ken Reedy, City Engineer  
Lyle Dechant, County Attorney  
Pat Nelson, CDH  
Marshall Fisher, EPA  
Pete Heye, HDR  
File