

INTER-OFFICE COMMUNICATION

TO : Frank Rozich through ^{Feb.} Jeb Love and
Ron Schuyler
FROM: Cal Youngberg

DATE : March 13, 1984

SUBJECT: Grand Junction (C080337-25)

As you may or may not know, the Grand Junction Persigo Wash plant has been operational since early February. Self-monitoring records that we have obtained indicate that the facility failed to meet BOD and TSS limits for two to three weeks after start-up. Even though this is a short period, you should be aware that the procedures for start-up that were followed did not conform to those outlined in the Plan of Operation for the facility. The P of O specifically calls for a phased start-up of the Persigo plant and a corresponding shut-down of the old Westside plant over a three month period so that effluent limitations will not be exceeded. Instead of following this approach, the Grand Junction operating staff decided to shut down the old plant completely and route all flow to the Persigo facility as soon as the latter was substantially complete. The fact that the City/County did not follow the Plan of Operation, part of which was developed to insure that effluent limits were met during the start-up period, makes one wonder how much the Plan means. The Plan of Operation is intended to be the operating basis for management of a wastewater treatment facility. It is fundable through the grants program because it is an integral part of the goals of the Clean Water Act. Although I can find no specific requirement to follow the P of O in the grant regulations (just a requirement to "submit" one), it is mentioned in PL 92-500, Section 204(4), as one of the assurances that must be made by a grantee that the treatment facility will meet the enforceable requirements of the Act. Apparently, the implementation of the P of O is also important to EPA, since it is mentioned in many of our delegation agreements, including those for preconstruction conferences and final inspections. The Plan of Operation is not meant to be a bureaucratic exercise which must be submitted by the grantee's consultant. Unfortunately, many grantees consider it to be exactly that, and apparently Grand Junction/Mesa County is one of them.

Consequently, I would like to request that your staff research the possibility of withholding the grant funds committed to the preparation of Grand Junction's Plan of Operation (and the related start-up services) since the grantee has obviously not followed the Plan's recommendations and, because of this, has violated effluent limits during the start-up period. My recommendation is that the funds be withheld at the final payment point. I believe that an audit of the project would probably recommend the same thing. We are proceeding with an enforcement action against the City/County for exceeding effluent limits, but I think that withholding payment for the P of O is an action that needs to be taken regardless. Please let me know how you intend to proceed. None of the above discussion is meant to be a criticism of the Grand Junction operating staff; they have done an excellent job in starting the plant up in a short period of time as well as training themselves for operating the new facility (which is significantly more complex than the old one). The problem seems to lie with the grantee and its perception of what the Plan of Operation means,

cc: Pat Nelson
Grant File
Permits File
Dick Bowman, D.E.



Signature

AD BUS-29 (10-29-100)