



May 3, 1984

WQCO - FIELD SERVICES
& MONITORING SECTION
GRAND JUNCTION

City of Grand Junction, Colorado 81501
250 North Fifth St.

Mr. Jeb Love, P.E., Chief
Colorado Department of Health
Permit and Enforcement Section
Water Quality Control Division
4210 East 11th Avenue
Denver, CO 80220

Re: In the matter of: The City of Grand Junction/Mesa County
Colorado; Reply to Cease and Desist Order; Certified
Mail No. P396718171

Dear Mr. Love,

The following is our letter of acknowledgement and response to your Notice of Violation and Cease and Desist Order issued April 26, 1984 and received by this office on April 30, 1984; which occurred during the start-up phase of the Persigo Wastewater Treatment Plant; CDPS Permit No. CO-0040053; between January 7, 1984 and February 7, 1984.

I first must express my apology for the over-sight, on my part, for not sending a cover letter explaining the high BODs during the initial January start-up of the Persigo Plant.

The high BODs during this period were caused, in part, by the inability of the raw primary wastewater to instantly create an adequate and acceptable bio-mass for the activated sludge process; along with extremely cold weather which this area experienced during January 1984. The Persigo Plant's ability to quickly establish this mass has been the only measure necessary to prevent any further high BOD violations. All during February 1984, the BODs were in compliance. During March the BODs were 15 mg/l or below. And, in April, they were all below 10 mg/l.

The Persigo Plant is operating efficiently, well within its design parameters, and with the exception of a mechanical failure or a toxic upset, the plant will continue without further permit violations.

With respect to our failure to precisely follow the March 1982 Plan of Operation, revised and approved April 22, 1982; under EPA Grant C 080337-26; we submit the following:

Construction of the Persigo Plant was far ahead of schedule. During the early part of December 1983, it was determined by the Contractor, Robert Dougan Construction Co., HDR (Design Engineers), and the City of Grand Junction that the Persigo Plant start-up would begin Monday January 16, 1984.

The contractor's "shake-down" had been implemented during November and December of 1983. With very few exceptions, all of the plant's equipment was operated during this time. Tanks were checked by filling with ground water; and, pumps, motors and gear boxes were run during fill and draw exchanges of water between tanks.

Within this same time frame, HDR geared up their on-going training program in preparation for the plant's start-up.

On January 16, 1984 the flow was split between the old Westside Plant and the Persigo Plant. However, we experienced two problems which had not been foreseen; 1) The Diversionary Box located at Westside, which was used for splitting the flows, could not maintain a proportionate flow for both plants. And, 2) The main lift pumps at the Persigo Plant which are each 10 MGD pumps could run for only short periods of time without placing the entire automated system into alarm. There was not adequate flow to keep all systems operating successfully.

Because of the extremely cold weather and the uneven splitting of the flows, the Westside Plant experienced icing and freezing conditions within its secondary treatment system.

Within a few hours of start-up the new Persigo Plant operated smoothly. After a week of successful operation, it was decided that it would be to our advantage and smooth development of the all-over operation if the Westside Plant were permanently closed rather than continue its operation under such adverse conditions.

The complete phase-out and abandon of all package plants was accomplished on or before January 16, 1984; almost one year ahead of the Plan of Operation's scheduled dates. All other phases of this plan have either been implemented, completed or are ahead of the scheduled dates for completion.

The Plan of Operation has served us well. It is our guideline for adherence without delays or omissions for the implementation of all necessary items prescribed, and as long as we continue with some degree of flexibility, all items will be completed on or before the estimated date for implementation.

Again, I want to apologize for not submitting the explanation for the January high BODs. I was totally unaware of this oversight until you brought it to my attention.

Should your office require further information in regards to the disposition of this matter, please contact me, and I will do whatever else may be required.

Respectfully,


Jerry O'Brien, Facility Supervisor
Persigo Wastewater Treatment Plant

xc: Gary G. Broetzman, Director
Water Quality Control Division

Melinda Kassen, Assistant Attorney General

Richard Bowman, District Engineer, WQCD

Gary Lucero, Mayor, City of Grand Junction

Lyle Dalchant, Attorney, County of Mesa

Maxine Albers, Chairman, County of Mesa

Jim Patterson, Director of Public Works

Ralph Sterry, Utilities Operations Superintendent

JO:skw