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City of Torrington

2017 East A Street • P.O. Box 250 • Torrington, WY 82240-0250 (307) 532-5666 • Fax (307) 532-2010

Dennis Hemmer, Director Wyoming Department of Environmental Quality Water Quality Division Herschler Building, 4 West 122 West 25th Street Cheyenne, WY 82002 FILED

JUL 18 2001

By

Terri A. Lorenzon, Director

Environmental .Quality Council

Subject: Torrington NPDES Permit Modifications Appeal

#01-3601

Dear Mr. Hemmer:

The City of Torrington appeals the new selenium level set forth in the June 12, 2001 permit modifications. The new selenium limit has been established at 4 μ g/l. The city is respectfully requesting your consideration in revising the selenium limit to allow 5 μ g/l at outfall 002.

Basis:

The City of Torrington is currently operating its water system under an "Administrative Order" issued by the Environmental Protection Agency. Conditions listed in the Order required the installation of treatment on existing municipal wells. The primary focus of treatment is on the reduction of nitrate in the drinking water. Although several treatment options were review, reverse osmosis appeared to be the most cost effective and implementable alternative. Therefore, four (4) large reverse osmosis units were installed. Concentrate discharge is through the wastewater treatment system.

Selenium, which is naturally occurring in the aquifer, is removed and concentrated during the reverse osmosis filtration process. Laboratory tests indicate the selenium level in the ground water is $6.0 \,\mu\text{g/l}$, the North Platte River is $4 \,\mu\text{g/l}$ and $8.49 \,\mu\text{g/l}$ from outfall 002. It is impossible to blend ground water or river water with the effluent discharge and meet the established selenium level of $4 \,\mu\text{g/l}$.

The blending process using river water would be effective if the allowable selenium level was raised to 5 μ g/l at outfall 002. It would require approximately 3,681 gallons per minute blended with the waste stream to meet a 5 μ g/l limit.

The city has purchased two, 2,500 gpm pumps and pipeline to facilitate the blending process. Equipment delivery should be within the next two weeks. We have currently spent \$116,470 on equipment and anticipate annual operating cost between \$60,000 and \$70,000.

Sincerely,

Gary Gerhard, Facility Planner

