

L/E WWTP Sewer Service Agreement Addendums





Overview

- ▶ Existing sanitation district Sewer Service Agreements (IGAs) with Littleton and Englewood
- ▶ EPA Audit
- ▶ Addendums to Sewer Service Agreements
- ▶ Benefits
- ▶ Questions



Existing Sanitation District IGAs

- ▶ Formal agreements between City and districts for wastewater treatment services
- ▶ Initiated in mid-1980's
- ▶ 8 Littleton Districts (2 districts have agreements with both cities)
- ▶ 12 Englewood districts (previously 13)



EPA Audit February 2014

- ▶ *Audit Finding #1: "The Littleton Englewood Wastewater Treatment Plant does not have the legal framework to fully implement the Pretreatment Regulations in the 19 outside contributing jurisdictions in its service area because the intergovernmental agreements do not provide adequate delegation of the Pretreatment program implementation to the cities of Littleton and Englewood."*
- ▶ *Corrective Action Item*
"Update the intergovernmental agreements established between the cities of Littleton and Englewood and their respective contracted outside contributing jurisdictions to establish delegation for implementation of the Pretreatment Regulations."



Pretreatment-Specific Addendum

- ▶ Satisfies EPA audit requirement
- ▶ Same terms regardless of city
- ▶ Language approved by City attorneys, WWTP attorney, and sanitation districts
- ▶ Three scenarios:
 - With Industrial Users, conduct own FOG and POGS inspections
 - With Industrial Users, Pretreatment Division Conducts FOG and POGS inspections
 - Without Industrial Users



Benefits of Addendum

- ▶ Establishes delegation of Pretreatment Program responsibilities in sanitation districts
- ▶ Same provisions, regardless of city
- ▶ Clearly defines expectations
- ▶ Establishes authority to apply Pretreatment regulations throughout the service area



Questions?