

**LITTLETON/ENGLEWOOD
WASTEWATER TREATMENT PLANT
INDUSTRIAL PRETREATMENT DIVISION**

MEMORANDUM

TO: Mark Relph, Littleton Interim City Manager/Public Works Director
FROM: Jon Bridges, WWTP Industrial Pretreatment Administrator
DATE: March 16, 2017
SUBJECT: SEWER SERVICE AGREEMENT ADDENDUMS

The Sewer Service Agreement Addendum was developed to establish delegation for implementation of the Pretreatment Regulations in each sanitation district discharging to the L/E WWTP (in both Littleton and Englewood). The requirement for this delegation came from EPA following an audit of the L/E WWTP Industrial Pretreatment Program in February 2014. One of the outcomes of the audit was the following, along with its associated corrective action:

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."

In order to comply with EPA's requirement, the Industrial Pretreatment Division proposed to EPA, and the Cities of Littleton and Englewood, to develop an Industrial Pretreatment-specific addendum to the sewer service agreements currently in place between individual sanitation districts and the Cities. In this manner, EPA's requirement to "establish delegation for implementation of the Pretreatment Regulations" would be accomplished without re-opening the existing agreements and the addendum could then be a standard agreement for all districts.