

# L/E WWTP Wastewater Connector's Agreement Addendum and Interpretive Memorandum for Ken Caryl Ranch Water and Sanitation District

Presented to the City of Littleton City Council for  
approval on 1st reading

# Existing Sanitation District IGAs

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

# 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
- ▶ Establishes delegation of Pretreatment Program in sanitation districts
- ▶ Clearly defines expectations and requirements
- ▶ Same terms regardless of city
- ▶ Language approved by City attorneys, WWTP attorney, and sanitation districts

# Status

- ▶ All 8 Littleton Connectors have signed the addendums
- ▶ 7 of 8 addendums presented and approved by Littleton City Council at 2nd reading on May 16, 2017
- ▶ Ken Caryl Ranch Water and Sanitation District addendum is being presented tonight for Council approval at 1<sup>st</sup> reading
- ▶ The addendum language is consistent with the previously approved addendums
- ▶ Addendum is contingent on the execution of an Interpretative Memorandum as requested by the District's Board of Directors.

# Status

- ▶ The Interpretative Memorandum clarifies the intent of the addendum and the meaning of certain terms and provisions including reasonable notification by the WWTP to the District of inspection events and enforcement actions against Industrial users within the District Boundaries.
- ▶ The Interpretative Memorandum has been approved by the EPA, WWTP attorney and Sanitation District
- ▶ EPA reviewed the memorandum to ensure that no language has been included that conflicts with the addendum language nor lessens the intent and authority established in the addendum.

Questions?