

## Local Limits

### RECOMMENDATION

The South Platte Water Renewal Partners (SPWRP) staff and the SPWRP Supervisory Committee recommends that the City of Littleton, City Council approve, by ordinance, the SPWRP Industrial Pretreatment Local Limits technical evaluation as drafted and preliminarily approved by the US EPA (United States Environmental Protection Agency).

### PREVIOUS CITY COUNCIL ACTION

Previous City Council approval of prior Local Limits technical evaluations were completed for prior discharge permits.

There has been no previous City Council action on this SPWRP Local Limits technical evaluation for the new discharge permit, Permit Number CO0032999, which was issued to the SPWRP effective date of December 1, 2017.

### SUMMARY

Local limits are wastewater limitations on pollutants like metals and solvents that apply to commercial and industrial facilities. Local limits put controls on the discharge of toxic pollutants into the treatment system. The EPA requires wastewater plants to set new local limits each time they receive a discharge permit.

The purpose of setting these limits is to:

- Protect the facility against contaminants passing through the system or interfering with the treatment capabilities of the system.
- Protect receiving water quality
- Protect worker health and safety
- Improve opportunities for beneficial reuse of residuals

### ANALYSIS

A comparison of past and proposed local limits is included in the table below.

**Calculated Local Limits Versus Previously Established Limits**

	<b>2009 Calculated Uniform Local Limits (mg/L)</b>	<b>2018 Calculated Uniform Local Limits (mg/L)</b>
Arsenic	0.55	0.014
Benzene	0.050	0.14
BTEX	0.750	0.750
Cadmium	0.30	0.22
Chromium	2.90	5.37

	<b>2009 Calculated Uniform Local Limits (mg/L)</b>	<b>2018 Calculated Uniform Local Limits (mg/L)</b>
Copper, Total	3.94	3.42
Cyanide	N/A	0.31
Hexavalent Chromium	0.86	1.97
Lead	0.51	2.90
Mercury	0.005	0.001
Molybdenum	2.82	5.69
Nickel	2.66	3.76
Selenium	0.054	0.24
Silver	0.112	0.68
Zinc	8.8	34.35

Limit concentrations are determined by considering what comes into the plant, how much the plant can handle, and what the limits are on the South Platte River. Limits will fluctuate between permits based on changes in: permit limits, stream standards, plant capabilities and what industries are in the service area.

#### FINANCIAL IMPLICATIONS

N/A

#### ALTERNATIVES

N/A

#### CONCLUSION

The South Platte Water Renewal Partners (SPWRP) staff and the SPWRP Supervisory Committee recommends approval of the Local Limits technical evaluation as drafted. The evaluation has been reviewed by the EPA and the SPWRP staff has addressed any EPA comments and concerns. The SPWRP staff has also met with local industries that may be affected by these new limits. The Local Limits technical evaluation has also been reviewed by SPWRP legal counsel.

The SPWRP staff is working in conjunction with both the Cities of Littleton and Englewood for their approval, by ordinance, to incorporate the Local Limits into their respective municipal codes. After first reading, on Tuesday, April 2, 2019, a 30-day public notice period would be conducted by the EPA. At the conclusion of this period, the second reading, tentatively scheduled for Tuesday, May 21, 2019, would progress with subsequent incorporation into each city's municipal code.

#### ATTACHMENTS

- *SPWRP Local Limits Technical Evaluation*
- *Local Limits PowerPoint*