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THE INDUSTRIAL PRETREATMENT PROGRAM

The Metro Wastewater Reclamation District administers a metro area program for the control of industrial wastes known as the Pretreatment Program. The purpose is to reduce discharges of pollutants from industrial and commercial sources into the municipal sewer system. The Metro District's efforts, together with some 1,500 similar programs nationwide, comprise the National Pretreatment Program.

The U.S. Congress created the national program in 1972 to protect the nation's wastewater treatment plants and waterways from discharges of toxic and other pollutants. The term "pretreatment" refers to the requirement that industries discharging pollutants treat their wastewaters before discharging to municipal sewer systems.

The objectives of the National Pretreatment Program are:

- To protect municipal wastewater treatment systems (also called publicly owned treatment works, or POTWs) from interference caused by industrial wastes.
- To protect the nation's waters from industrial pollutants that pass through POTWs untreated.
- To provide for the beneficial use of POTWs' wastewater biosolids (the solid materials resulting from wastewater treatment) as soil conditioners and fertilizers, by preventing excessive contamination by industrial pollution.

The U.S. Environmental Protection Agency (EPA) administers the National Pretreatment Program under the General Pretreatment Regulations, first adopted in 1978. These regulations, amended several times since then, set forth specific requirements that both POTWs and industries must comply with to reduce industrial pollutant discharges.

POTW PROGRAM RESPONSIBILITIES

The General Pretreatment Regulations require that any POTW which is designed to treat over 5 million gallons a day of wastewater, or which receives significant discharges from industrial sources, must develop a local Pretreatment Program which conforms to EPA regulations. As the operator of a wastewater treatment facility treating an average of 160 million gallons a day, the Metro District developed such a program.

The Metro District provides wastewater transmission and treatment services to 55 local governments in the Denver area. The Metro District owns and operates a network of large interceptor sewers (similar to limited access highways). The interceptors convey wastewater from the local governments' sewer collection systems to the Metro District's Central Treatment Plant. The local governments are responsible for their individual sewer systems and for discharges into them, including industrial wastes.

Local governments served by the Metro District include the City and County of

Denver; the cities of Arvada, Aurora, Edgewater, Federal Heights, Lakewood, and Thornton; parts of Englewood, Golden and Westminster; the town of Mountain View; and some 50 sanitation districts in the metro area. Each of these local governments is responsible for implementing the requirements of the Metro District's Pretreatment Program in its own service area.

Under the General Pretreatment Regulations, the Metro District and its local government connectors must:

- Develop local limits for toxic and other pollutants as necessary to protect sewage treatment operations, treated wastewater (called effluent), biosolids quality, and worker health and safety.
- Identify all commercial and industrial dischargers subject to regulation under the Pretreatment Program. These dischargers are referred to as significant industrial users (SIUs).
- Issue permits to all SIUs to control pollutant discharges, require SIU discharge monitoring and reporting and, where necessary, require the installation of wastewater treatment facilities.
- Monitor SIU operations, discharges, and reports to determine compliance with federal and local pretreatment standards and requirements.
- Take appropriate enforcement actions against industries found to be in violation of applicable requirements. Depending upon the seriousness of the violations, these enforcement actions may include monetary penalties and termination of wastewater service.

INDUSTRIAL USER RESPONSIBILITIES

All businesses, including industrial, commercial, and governmental establishments, that discharge other than normal sanitary wastewater are technically subject to the requirements of the General Pretreatment Regulations. For most businesses, this simply means that they must not discharge anything that will adversely affect the sewage system or its workers, or the sewage plant biosolids or effluent.

For businesses discharging significant amounts of toxic pollutants, or other pollutants in amounts, which may be detrimental to the Metro District's operations, additional regulation is required. These businesses, classified by the Metro District as significant industrial users (SIUs), are required to obtain industrial wastewater discharge permits in order to discharge to the sewer system. Each permit contains specific limits on industrial pollutants that can be present in an industry's discharge. Permits also contain monitoring and reporting requirements with which the industry must comply if it is to continue discharging to the municipal sewer system.

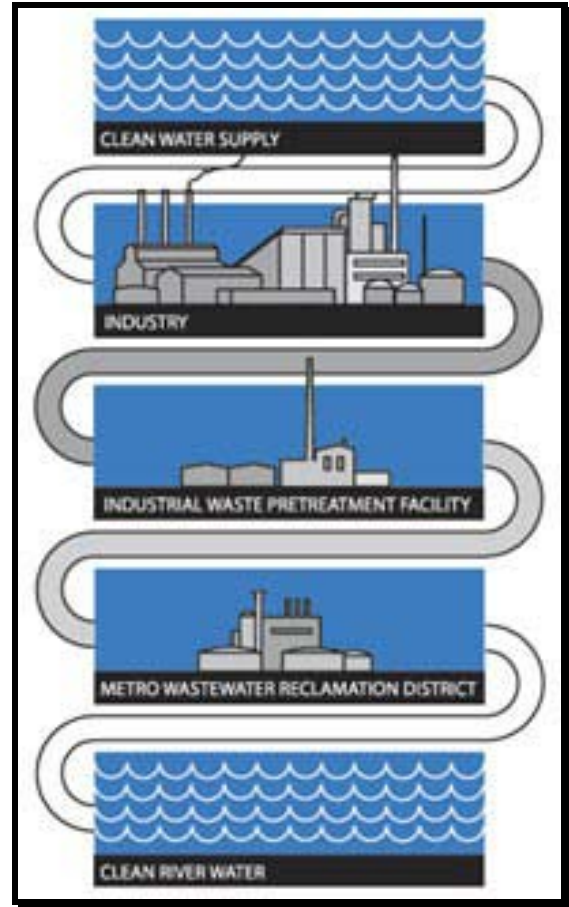
Which businesses are SIUs? All businesses engaged in operations identified as "categorical" processes by EPA are automatically considered SIUs. These categorical processes include electroplating, metal finishing, nonferrous metals forming, battery manufacturing, and a number of other activities. EPA has established "categorical standards" for these processes, which limit the quantities of various pollutants that can be discharged to the sewer. Categorical

standards are national standards, and all businesses in the U.S. engaged in the same categorical processes are subject to the same standards.

Businesses that discharge 25,000 gallons per day or more of process wastewater are also considered SIUs, unless they are found by the Metro District to have no potential to violate local pretreatment standards. These standards are pollutant limitations developed by the Metro District to protect sewage plant operations, effluent and sludge quality. They include limitations on such toxic pollutants as copper, lead, zinc, mercury, molybdenum, and perchloroethylene.

Finally, any business, regardless of size, whose discharge has the potential to adversely affect the operations of the Metro District or its connectors is considered to be an SIU.

Where necessary to meet applicable pretreatment standards, SIUs are required to install facilities to treat their wastewaters prior to discharge into the municipal sewer system. SIUs must periodically sample and analyze their discharges to determine compliance, and must report the results to the Metro District or one of its connectors. SIUs who fail to comply with pretreatment standards face the possibility of serious enforcement actions, including monetary penalties and termination of sewer service.



FOR FURTHER INFORMATION ON THE METRO DISTRICT'S PRETREATMENT PROGRAM, PLEASE CONTACT:

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