

Metro Wastewater Reclamation District

2002 Permit Application Information on Effluent Quality & Impacts on Receiving Water Quality

The Metro District is submitting data on pollutants resulting from its operations and treatment process in accordance with the disclosure requirements of this application, Clean Water Act §§ 301 and 402, and the Colorado permit application regulation, 5 CCR 1002-61.

The Metro Wastewater Reclamation District (District) collects, treats, and discharges the wastewater generated by approximately one-and-one-half (1.5) million people and their associated commercial, industrial, and residential activities in the Denver, Colorado metropolitan area. The District operates two hundred thirty-six (236) miles of interceptor sewers connected to fifty-six (56) satellite municipalities and special districts. The District also routinely accepts hauled wastes (including oil and grease) from septic sources, portable toilets, and non-hazardous commercial and industrial sources. As such, the character of the District's influent and effluent is similar to those of other large municipal dischargers, i.e., the District's influent and effluent contain a wide range of naturally occurring and anthropogenic chemical and pollutant contributions that cannot always be completely anticipated or identified. Given the facts that literally thousands upon thousands of chemical are used in the United States and that many of these are discharged to the sanitary sewer system in some quantity in the ordinary course of residential, commercial, and industrial activities, it is reasonable to expect some quantity of these myriad chemicals are contained in the District's influent and effluent. Wastewater treatment facilities do not remove one hundred percent of these chemicals, although in many cases, these pollutants are present at extremely low levels, often at levels undetectable using current analytical methods.

The U.S. Environmental Protection Agency has recognized that "it is impossible to identify and rationally limit every chemical or compound present in the discharge of pollutants." As part of this Colorado Discharge Permit System (CDPS) application to the Colorado Water Quality Control Division (Division), the District is submitting all available data and information regarding the nature and quality of its influent, effluent, and receiving waters at the time of submittal of this application.

The chief pollutants and waste streams from the District's residential, commercial, and industrial sources are identified in this application based on express State and Federal permit application requirements and the best professional judgment of District staff. Additionally, it is the District's intention to fully disclose all relevant and available information and data regarding actual and potential sources of pollutants in order to limit the District's liability under the Clean Water Act as required by the "permit as a shield" doctrine. To this end, the District is submitting on the enclosed compact disk "**SIU/Zero Discharge**" [see **Attachment 2**] all current information and discharge data on the Significant Industrial Users regulated under the District's Pretreatment Program.

The enclosed compact disk "**Industrial Waste Survey 4-30-02.xls**" [see **Attachment 2**] contains all information regarding possible pollutant discharges from the District's comprehensive industrial waste survey database, which covers the approximately 19,600 non-domestic dischargers in the District's service area. The District encourages the Division to request any additional information from the District that would assist it in ensuring that water quality standards and receiving waters affected by the District's discharge are protected through effluent limitations in the District's (CDPS) permit.

The District believes that this CDPS application adequately disclosed all relevant information necessary for the Division to identify the pollutants that have reasonable potential to cause or contribute to an excursion above any water quality standards and to establish appropriate effluent limitations. Moreover, the District believes that this application adequately discloses all relevant information concerning pollutants for which water quality standards exist, but where the probability of the District's effluent causing or contributing to an exceedance of water quality standards is so small that effluent limits are unnecessary. Finally, the District believes that this application adequately discloses all relevant information concerning sources and processes that produce a myriad of pollutants in the District's effluent for which no water quality standards exist, but which the District necessarily discharges in the ordinary course of its business.