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Metropolitan Water Reclamation District of Greater Chicago

100 EAST ERIE STREET CHICAGO, ILLINOIS 60611-3154 312-751-5600

June 27, 2005

Richard Lanyon
Director of Research & Development
312-751-5190

Mr. Toby Frevert
Manager
Division of Water Pollution Control
Bureau of Water
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P. O. Box 19276
Springfield, Illinois 62794-9276

Dear Mr. Frevert:

Subject: Annual Publicly Owned Treatment Works (POTW)
Pretreatment Report – 2004

This letter is to advise you that the Metropolitan Water Reclamation District of Greater Chicago (District) has completed its Annual POTW Pretreatment Report for calendar year 2004.

Due to its voluminous size, only one copy of the subject report is enclosed. Copies of the subject report have also been sent to Ms. Carol Staniec, United States Environmental Protection Agency, Region 5, and Mr. Jay Patel, Illinois Environmental Protection Agency, Des Plaines, Illinois.

If further information is required regarding this report, please contact Mr. Louis Kollias, Assistant Chief Engineer, Research and Development, at 312-751-3040.

Very truly yours,



Richard Lanyon
Director
Research and Development

RL:LK:PK:pk

Enclosures

cc/enc: C. Staniec, USEPA, J. Patel, IEPA

cc: M. Garrettson, IEPA, R. Callaway, IEPA, M. Gluckman, USEPA, J. Traub, USEPA,
O. Jamjun, S. O'Connell, L. Kollias

POTW Pretreatment Annual Report Certification Statement

POTW Owner Name: Metropolitan Water Reclamation District of Greater Chicago

Report Date: June 27, 2005

Period Covered by this Report: From: 01/01/04 To: 12/31/04

<u>Name of Wastewater Treatment Plant(s)</u>	<u>NPDES Permit Number(s)</u>
Calumet Water Reclamation Plant	IL0028061
John E. Egan Water Reclamation Plant	IL0036340
Hanover Park Water Reclamation Plant	IL0036137
James C. Kirie Water Reclamation Plant	IL0047741
Lemont Water Reclamation Plant	IL0028070
North Side Water Reclamation Plant	IL0028088
Stickney Water Reclamation Plant	IL0028053

Person to contact concerning information contained within this report:

Name: Mr. Louis Kollias
Title: Assistant Chief Engineer
Research and Development
Address: 100 East Erie Street
City: Chicago
State: Illinois Zip Code: 60611
Phone: (312) 751-3040
E-mail: louis.kollias@mwrdr.org
Fax: (312) 751-5048

I have personally examined and am familiar with the information submitted in the referenced Pretreatment Annual Report. Based upon my inquiry of those individuals immediately responsible for obtaining the information reported therein, I certify that the submitted information is true, accurate and complete.



Signature of Official

Date: June 27, 2005
Name of Official: Richard Lanyon
Title of Official: Director of Research and Development
RL:PK:pk

**ILLINOIS EPA
MODIFIED PRETREATMENT SUMMARY FORM**

IL0028061
IL0036340
IL0036137
IL0047741
IL0028070
IL0028088
IL0028053

PART I - GENERAL SUMMARY INFORMATION FOR THE REPORT PERIOD

NAME: Metropolitan Water Reclamation District of Greater Chicago NPDES NUMBER(S): _____

REPORT PERIOD FROM: January 1, 2004 TO: December 31, 2004

- 1) NUMBER OF SIUs IN SNC WITH A PRETREATMENT COMPLIANCE SCHEDULE (SSNC): _____ **4**
- 2) NUMBER OF FORMAL ENFORCEMENT ORDERS ISSUED TO SIUs (FENF): _____ **159**
- 3) NUMBER OF CIVIL AND CRIMINAL JUDICIAL SUITS FILED IN COURT TO SIUs (JUDI): _____ **0**
- 4) NUMBER OF SIUs WITH SIGNIFICANT VIOLATIONS PUBLISHED (SVPU): _____ **53**
- 5) NUMBER OF IUs FROM WHICH PENALTIES (BEYOND TYPICAL USER CHARGES) HAVE BEEN COLLECTED (IUPN): _____ **3**
- 6) DOLLAR AMOUNT OF PENALTIES COLLECTED (PAMT): _____ **\$6,000.00**
- 7) NUMBER OF SIUs ON COMPLIANCE SCHEDULES (SOCS): _____ **113**

PART II - CURRENT SIGNIFICANT INDUSTRIAL USER INFORMATION

- 1) TOTAL NUMBER OF SIGNIFICANT IUs (SIUs): _____ **456**
- 2) NUMBER OF CATEGORICAL IUs (CIUS): _____ **307**
- 3) NUMBER OF SIUs NOT INSPECTED OR SAMPLED (NOIN): _____ **1**
- 4) NUMBER OF SIUs SAMPLED: _____ **443**
- 5) NUMBER OF SIUs INSPECTED: _____ **455**
- 6) TYPE OF CONTROL MECHANISM USED (ORDINANCE, PERMIT, CONTROL DOC.): _____ *****
- 7) NUMBER OF SIUs WITHOUT CONTROL MECHANISMS (NOCM): _____ **5**
- 8) NUMBER OF SIUs CURRENTLY IN SNC WITH STANDARDS OR REPORTING (PSNC): _____ **6**
- 9) NUMBER OF SIUs CURRENTLY IN SNC WITH PRETREATMENT STANDARDS (SNPS): _____ **4**
- 10) NUMBER OF SIUs CURRENTLY IN SNC WITH REPORTING REQUIREMENTS (RSNC): _____ **2**
- 11) NUMBER OF SIUs CURRENTLY IN SNC WITH SELF-MONITORING (MSNC): _____ **0**
- 12) NUMBER OF SIUs IN SNC WITH SELF MONITORING AND NOT INSPECTED OR SAMPLED (SNIN): _____ **0**

PART III - ADMINISTRATIVE INFORMATION

- 1) TOTAL ANNUAL WORK HOURS DEVOTED TO THE PRETREATMENT PROGRAM: _____ **174,499****
- 2) ANNUAL PRETREATMENT PROGRAM BUDGET (DOLLARS): _____ **\$6,322,248**
- 3) ATTACH NARRATIVE SUMMARY OF ACHIEVEMENTS, PROBLEMS AND SUBSTANTIVE CHANGES DURING THIS REPORTING PERIOD.

* Ordinance and Discharge Authorization

** Budget allocation hours for FY2004

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

ANNUAL PRETREATMENT PROGRAM REPORT – 2004

NARRATIVE SUMMARY

On November 18, 1985, the United States Environmental Protection Agency (USEPA) granted its approval of the pretreatment program of the Metropolitan Water Reclamation District of Greater Chicago (District).

Pursuant to the General Pretreatment Regulations (40 CFR 403) which contain the requirements for an approved pretreatment program, the District has identified 14 major program elements of its approved pretreatment program. A summary of the District's activities during 2004 with regard to each major program element is provided below.

Program Element 1

The District must deny or establish conditions for the discharge of pollutants from industrial users (IU) to District facilities.

The District regulates the discharge of pollutants from IUs into its facilities through administration of its Sewage and Waste Control Ordinance (Ordinance), adopted September 18, 1969 and as amended.

During 2004, the District continued aggressive enforcement of the standards and requirements of its Ordinance. Under the provisions of Appendix D of the Ordinance, adopted on September 5, 1991, the District continued its program of issuing individual control mechanisms (Discharge Authorizations) to all significant IUs (SIU).

As of December 31, 2004, 451 of 456 (98.9%) SIUs had been issued Discharge Authorizations. Of the five SIUs without Discharge Authorizations during the fourth quarter of 2004, one had a Discharge Authorization Request pending review; one had a Discharge Authorization renewal pending approval; two had expired Discharge Authorizations pending verification of no process discharge; and one was the subject of enforcement action for operating without a Discharge Authorization.

Program Element 2

The District must require compliance by IUs with applicable USEPA and local pretreatment standards.

The District requires compliance with applicable USEPA and local pretreatment standards through administration of its Ordinance. Appendix B of the Ordinance contains provisions regarding compliance with local pretreatment standards applicable to all dischargers to the District's sanitary sew-

erage system while Appendix C of the Ordinance contains provisions regarding compliance with pretreatment standards for IUs subject to categorical pretreatment standards promulgated by the USEPA.

During 2004, the District continued to enforce categorical pretreatment standards against all IUs subject to categorical pretreatment standards and initiated enforcement action against all IUs found in violation of categorical pretreatment standards. The District also continued its program of issuing individual Discharge Authorizations to all SIUs.

During 2000, the District signed an agreement with the USEPA and the Illinois Environmental Protection Agency (IEPA), which approved the District's pretreatment program for reduction of regulatory oversight and industrial self-monitoring requirements as established by the USEPA under Project XL. Project XL was implemented as an experiment designed to test new approaches to environmental protection with a degree of uncertainty regarding the environmental benefits and costs associated with activities undertaken in the project. On November 1, 2001, the Ordinance was amended to include the addition of Appendix G, Provisions Applicable to National Industry Sector Initiatives and Project XL. Appendix G established performance-based initiatives and regulatory flexibility for industrial users participating in the District's Project XL.

On September 9, 2004, the USEPA notified the District of its intent to terminate the Project XL agreement. Based on the fact that the level of industrial user participation in this initiative fell far below expectations envisioned at the signing of the Final Project Agreement (FPA), and that the District had not realized the anticipated time and cost savings from Project XL, the District concurred with the USEPA's decision. Therefore, the Board approved an Amendment to the Ordinance to delete Appendix G to the Ordinance on November 4, 2004.

The USEPA Region 5 acknowledged receipt of a November 16, 2004 letter agreeing to the termination of the Project XL FPA that the District had entered into with the USEPA and the IEPA. The USEPA understands that the District has amended its Sewage and Waste Control Ordinance to delete the provisions, authorized under the FPA, which had allowed for reduced Industrial User self-monitoring and reporting.

As a result of the termination of this Project and in accordance with section XI.C. of the FPA, the District will revise the Discharge Authorizations for the Significant Industrial Users with reduced reporting and self-monitoring requirements authorized by the Project within the Interim Compliance Period of 15 months from the date of the letter. At that time, the District will be fully implementing its original approved Pretreatment Program.

Program Element 3

The District must control by permit, or some similar means, each IU's contribution to District facilities to ensure compliance with applicable pretreatment standards.

Prior to 1991, the District relied on its Ordinance as the regulatory mechanism to control the contribution from IUs, rather than the issuance of a permit or other mechanism specific to each IU.

On September 5, 1991, the District's Board of Commissioners (Board) adopted amendments to the Ordinance, including Appendix D governing the issuance of individual Discharge Authorizations to all SIUs under the District's jurisdiction.

As of December 31, 2004, 451 of 456 (98.9%) SIUs had been issued Discharge Authorizations. Of the five SIUs without Discharge Authorizations during the fourth quarter of 2004, one had a Discharge Authorization Request pending review; one had a Discharge Authorization renewal pending approval; two had expired Discharge Authorizations pending verification of no process discharge; and one was the subject of enforcement action for operating without a Discharge Authorization.

Program Element 4

The District must require all IUs not in full compliance with applicable pretreatment standards to submit a compliance schedule detailing all steps necessary to achieve compliance as well as a schedule for completion of these steps.

Prior to 1991, when an IU was found in violation of the Ordinance, a Notice of Violation was issued to the IU requiring attendance at a conciliation meeting. On some occasions, the IU was required to attend additional conciliation meetings until the IU made a claim of compliance. Conciliation meetings were scheduled in a manner that allowed the IU sufficient time to complete and evaluate the various steps agreed to in the compliance schedule developed at the first meeting. Monthly progress reports were required during long-term conciliations.

In accordance with legislation signed into law on September 10, 1990, the Board, on December 5, 1990, adopted amendments to the Ordinance eliminating the issuance of Notices of Violation, and implementing the issuance of Cease and Desist Orders (Order) for all instances of significant non-compliance with the Ordinance. The Order requires the non-complying IU to submit a formal compliance schedule to the District within 15 days of the issuance of the Order. Additionally, the Order limits the length of any compliance schedule entered into by an IU to 90 days. If an IU fails to submit a compliance schedule indicating that compliance will be attained within 90 days or if the IU fails to attain compliance within 90 days, the District may commence escalated enforcement action against the IU.

During 2004, the District continued vigorous enforcement of applicable pretreatment standards through the issuance of Orders requiring formal compliance schedules, Show Cause proceedings and litigation.

On February 18, 1993, the Board approved a Resolution authorizing the execution of an inter-agency agreement between the District and the Illinois Waste Management and Research Center (WMRC) for the Greater Chicago Pollution Prevention Program (GCP3).

Since 1993, the District has participated in the GCP3, a multi-agency task force including the District, USEPA Region 5, the IEPA, the Cook County Department of Environmental Control, the City of Chicago Department of Environment, the Illinois WMRC, and a number of community groups and small business development centers. The GCP3 provides training, outreach and technical assistance to Chicago area businesses to promote and encourage pollution prevention (P2) for all media, targeting facilities which most substantially impact the District or that are recommended by the GCP3 partners.

In 2002, the District and WMRC moved to enhance the GCP3 by initiating more proactive outreach to promote P2 awareness among the industrial users. All District Pollution Control Officers participated in workshops presented by WMRC that focused on identifying P2 opportunities and on referring interested industrial users to WMRC. Beginning in June 2002, Pollution Control Officers initiated P2 opportunity audits at all metal finishing sector industrial users, providing a leave-behind opportunity checklist for the industrial user's benefit. Pollution Control Officers also inquired whether the industrial users would be interested in further technical assistance from WMRC. Requests for assistance were then forwarded to WMRC for follow-up. By December 2003, P2 opportunity audits were completed for all metal finishing sector industrial users within the District's service area.

WMRC offers on-site technical assistance to industrial users with the primary goal of identifying P2 opportunities and solutions and, to a lesser extent, assistance addressing resolution of compliance issues and optimizing traditional waste treatment practices. WMRC tracks the number of companies to whom they have provided technical assistance under the GCP3.

A summary of industrial user participation in the GCP3 and response to outreach provided by WMRC during 2004 is provided in Table 1.

Program Element 5

The District must require IUs subject to categorical pretreatment standards to submit an initial Baseline Monitoring Report (BMR), and periodic self-monitoring reports to assure compliance with applicable pretreatment standards.

Prior to 1991, the District required IUs subject to categorical pretreatment standards to submit a BMR within 180 days of the promulgation date for the applicable categorical pretreatment standards and to submit continued compliance reports twice annually. IUs failing to submit reports as required are issued an Order, and directed to submit the required report within 30 days. Failure to submit the required report results in escalated enforcement action against the IU.

Under the provisions of Appendix D of the Ordinance, adopted September 5, 1991, SIUs, including IUs subject to categorical pretreatment standards, must obtain individual Discharge Authorizations from the District through submission of a Discharge Authorization Request, in lieu of the BMR.

During 2004, the District continued aggressive enforcement of reporting requirements applicable to all IUs. The District's enforcement actions with regard to IUs' failure to comply with pretreatment reporting requirements are summarized in Table 2.

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 1

INDUSTRIAL USER PARTICIPATION IN THE GREATER CHICAGO POLLUTION
PREVENTION PROGRAM – 2004

Industrial Users Provided with P2 Opportunity Audits by the District	12
Industrial Users Expressing Interest in Follow-up with WMRC	7
Industrial User Site Visits Conducted by WMRC as a Result of P2 Audits	7

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 2

SUMMARY OF ENFORCEMENT ACTIONS TAKEN BY THE DISTRICT AGAINST
INDUSTRIAL USERS FOR FAILURE TO COMPLY WITH APPLICABLE
REPORTING REQUIREMENTS 2003 – 2004

Type of Enforcement Action	2003	2004
Late Filing Fees Assessed	\$80,000	\$68,000
Cease and Desist Orders Issued	95	80
Recommendations for Show Cause Action	1	1
Recommendations for Legal Action	0	1

Program Element 6

The District must perform inspection and monitoring activities, independent of those conducted by IUs, which are sufficient to ensure that IUs are in compliance with applicable pretreatment standards.

Under its pretreatment program approved on November 18, 1985, the District, at a minimum, must inspect and sample all IUs subject to categorical pretreatment standards and other SIUs (then defined as IUs having a flow greater than 200,000 gallons per day) at least annually to verify compliance with applicable pretreatment standards. Inspections include observation of discharge points, process areas, pretreatment systems, generation of sludge and other process residues, maintenance of records, and any other items required by the Ordinance.

Pursuant to the amendments to the General Pretreatment Regulations, which became effective on August 23, 1990, the District, on September 11, 1991, revised its definition of SIU to include any IU which discharges greater than 25,000 gallons of process wastewater per day into the sanitary sewerage system.

During 2004, the District inspected all but one SIU and sampled all but thirteen SIUs having process discharges. The one SIU not inspected was newly regulated during the second half of 2004. Of the thirteen SIUs not sampled during 2004, seven were newly regulated during the second half of 2004; three did not discharge wastewater from their regulated processes during 2004; one did not provide an adequate sampling point; and two were not scheduled due to an oversight.

The District continued to use its comprehensive inspection checklist during inspections of IUs to ensure that information pertaining to chemical storage facilities, hazardous waste generation, spill control plans, IU self-monitoring techniques (when observed), and IU production rates was adequately obtained. All appointed professional staff of the Industrial Waste Division (Engineers and Pollution Control Officers) have attended and completed a training program in the performance of pretreatment facility inspections. This course was developed by the California State University in Sacramento, in cooperation with the California Water Pollution Control Association, for the USEPA. All professional personnel in the Industrial Waste Division have completed this training program in the performance of pretreatment facility inspections as a condition of their permanent status in the Industrial Waste Division.

As of December 31, 2004, there were 307 IUs subject to categorical pretreatment standards, and 149 non-categorical SIUs under the District's jurisdiction, who were subject to annual inspection and sampling. Of the 307 IUs subject to categorical pretreatment standards, two do not discharge wastewater from regulated categorical processes into the sewerage system.

The District's inspection and sampling activities during 2004, with regard to IUs subject to categorical pretreatment standards and SIUs, are summarized in Table 3.

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 3

SUMMARY OF DISTRICT INSPECTION AND SAMPLING ACTIVITIES WITH REGARD TO CATEGORICALLY REGULATED INDUSTRIAL USERS AND NON-REGULATED SIGNIFICANT INDUSTRIAL USERS 2003 – 2004

Inspection/Sampling Activity	Number of Actions During 2003	Number of Actions During 2004
IUs Having Process Discharge (Wet) Subject to Categorical Pretreatment Standards Inspected (305 in Category During 2004)	316	304
IUs Having Process Discharge (Wet) Subject to Categorical Pretreatment Standards Sampled (305 in Category During 2004)	305	297
IUs Lacking Process Discharge (Dry) But Subject to Categorical Pretreatment Standards Inspected (2 in Category During 2004)	2	2
Non-regulated SIUs Inspected (149 in Category During 2004)	157	149
Non-regulated SIUs Sampled (149 in Category During 2004)	151	144

Program Element 7

The District must investigate and remedy instances of noncompliance by IUs.

When the District determines that an IU is in violation of the Ordinance, either by District inspection and sampling or by IU self-reporting, an Order is issued against the non-complying IU. The IU is required to submit a written compliance schedule containing specific measures which will be taken to attain compliance and specific milestone dates by which such action will be taken.

In each case, on-site inspection and sampling is performed by the District to verify an IU's claim of compliance. If the IU is again found to be in noncompliance, escalated enforcement action (Show Cause or legal action) may be pursued.

During 2004, the District continued to take aggressive enforcement action against IUs found in violation of the Ordinance as a result of District inspection and sampling, and in response to IU self-reported violations.

The District's enforcement activities during 2004 in response to instances of noncompliance with effluent limitations by SIUs are summarized in Table 4.

Program Element 8

The District must obtain legal remedies for noncompliance by IUs (including injunctive relief and civil and/or criminal penalties) sufficient to deter further instances of noncompliance by IUs.

Once an IU claims that compliance has been achieved with regard to an Order, the District verifies this claim by inspection and sampling. If the IU is found in noncompliance, the District may determine that Show Cause action is warranted. Show Cause proceedings involve hearings conducted by a Hearing Officer appointed by the Board. At the conclusion of the hearings, the Hearing Officer makes a finding of fact and a recommendation to the Board for action regarding the non-complying IU. The recommendation, upon adoption, becomes an Order of the Board (Board Order). An IU in significant noncompliance with a Board Order may be recommended for legal action in the Circuit Court of Cook County, to halt the condition of noncompliance either by mandamus or injunction.

Pursuant to Chapter 70, Section 2605/7bb of the Illinois Compiled Statutes, the District may seek a penalty of not less than \$1,000.00 nor more than \$10,000.00 per day for each day on which the IU remained in noncompliance with a Board Order, plus recovery of reasonable attorney's fees, court costs and other expenses of litigation, and costs for inspection, sampling, analysis and administration relating to the enforcement action, beginning with the issuance of the initial Order. For each day of violation prior to the issuance of the Board Order, the penalty may be reduced to not less than \$100.00 per day of violation.

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 4

SUMMARY OF DISTRICT ENFORCEMENT ACTIVITIES IN RESPONSE TO
 INSTANCES OF NONCOMPLIANCE WITH EFFLUENT LIMITATIONS BY
 SIGNIFICANT INDUSTRIAL USERS 2003 – 2004

Enforcement Action	Number of Actions During 2003	Number of Actions During 2004
Notice of Noncompliance for Local Limits	123	132
Notice of Noncompliance for Categorical Limits	94	77
Cease and Desist Order for Local Limits	138	57
Cease and Desist Order for Categorical Limits	88	90
Recommendation for Show Cause Action	1	9
Recommendation for Legal Action	0	0

Pursuant to the authority granted to the District under Senate Bill 1683 and the Ordinance amendments adopted by the Board on January 28, 1993, the District commenced the inclusion of administrative penalties in Board Orders for violations occurring after January 28, 1993. For violations which occurred prior to the January 28, 1993 Ordinance amendments, the District continued its policy of seeking penalty provisions in agreed Board Orders, while requiring IUs to conduct continuous self-monitoring until full compliance has been achieved, and providing for penalties for noncompliance during the period prior to the Board Order compliance date, to further increase deterrence.

The District's activities during 2003 and 2004, regarding Show Cause and legal action for non-compliance by all IUs, are summarized in Table 5.

Program Element 9

The District must identify and locate all IUs within its jurisdiction affected by pretreatment regulations and notify these IUs of the applicability of pretreatment regulations.

During 2004, the District continued its program of surveying IUs within its jurisdiction to identify those IUs subject to categorical pretreatment standards. A total of 121 Facility Classification Questionnaire/Industrial Category Determination Questionnaire (IU Survey) surveys were mailed in 2004 to both new IUs and to those IUs whose survey records were more than five years old.

Program Element 10

The District must obtain effective control of industrial waste discharges which endanger public health, the environment, or the operation of the District's water reclamation plants.

When the District determines that a discharge from an IU poses imminent endangerment to the health and safety of the public, the IU is immediately notified of such determination and is required to halt the discharge immediately. If this conciliatory approach fails to halt the endangering discharge, the District seeks emergency injunctive relief in the Circuit Court of Cook County.

During 2004 there were no occasions where the District was required to seek such emergency action against an IU for the control of discharges which posed a danger to public health, the environment or the operation of the District's water reclamation plants.

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 5

SUMMARY OF SHOW CAUSE AND LEGAL ACTION ACTIVITIES
TAKEN BY THE DISTRICT IN RESPONSE TO
INDUSTRIAL USER NONCOMPLIANCE 2003 – 2004

Enforcement Action	2003	2004
Number of IUs Subject to Show Cause Action	2	20
Number of Board Orders Issued	0	6
Penalties Paid by IUs in Response to Board Orders	\$0.00	\$6000.00
Number of IUs Recommended for Legal Action	0	1
Penalties Paid by IUs in Response to Legal Action	\$0.00	\$0.00

Program Element 11

The District must provide information to the public regarding IUs which are in significant non-compliance with applicable pretreatment standards, and other pretreatment requirements.

Included in the amendments to the Ordinance which were adopted by the Board on September 5, 1991 was Appendix E, which provides rules governing confidentiality and public access to information maintained by the District regarding IUs, and provides rules for the annual publication of significant violators in the newspaper.

A copy of the District's proposed list of significant violators, for the period from January 1, 2004 through December 31, 2004, is enclosed with this report. The list of significant violators is scheduled for publication in the Chicago Tribune during 2005 after the affected IUs have been allowed an opportunity to provide comments to the District regarding the appropriateness of publication.

A summary of the significant violator publication list for the years 2002, 2003, and 2004 is provided in Table 6.

Also included in the Chicago Tribune are the identities of those SIUs having exemplary compliance records for 2004. These SIUs were not the subject of any enforcement actions taken by the District with regard to significant noncompliance with applicable pretreatment standards or other requirements during 2004.

Pursuant to 40 CFR 403.14(b), the District also makes available, under Freedom of Information Act requests, all IU self-reported information detailing the nature of discharges from IUs to the District's water reclamation plants, or to the environment. The District also provides copies of all enforcement actions taken against an IU in noncompliance with the Ordinance to the municipality in which the IU is located.

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 6

SUMMARY OF SIGNIFICANT VIOLATOR PUBLICATION LIST 2002 – 2004

	2002	2003	2004
Number of Companies Subject to Publication	62	76	65
Violation Category			
Effluent Limitations	15	23	11
Reporting Requirements	49	54	54
Discharge Authorization Requirements	0	3	4
Monitoring Requirements	0	0	0
Pretreatment Facilities	1	0	0
Spill Containment Facilities	0	0	0
Right of Access	0	0	0
Dilution Prohibition	1	0	0
Total Violations Published	64	80	69

Program Element 12

The District must maintain all records regarding IUs in a database which will allow for easy retrieval of information.

Pursuant to its approved pretreatment program, the District has developed a computerized data management system which provides for the storage of all essential information contained in the IU Survey and BMR, enforcement history of the IU, the District's analytical data from sampling of IU discharges, and the District's inspection reports.

During 1990, the District conducted a comprehensive analysis of its pretreatment program information management system (PIMS), using contract consulting services. This analysis resulted in recommendations for changes in the District's current PIMS, as well as data management systems for the District's User Charge program and its Finance Department. The District conducted a review of these recommendations during 1991 and commenced implementation of those recommendations which were found to have merit, using both professional staff and contract consulting services.

During 2004, the District continued implementation of the PIMS recommendations where appropriate, using both professional staff and contract consulting services.

Program Element 13

The District must maintain adequate staff and equipment to enable it to execute all pretreatment program responsibilities in a timely manner.

Detailed information regarding the District's resources dedicated to the Pretreatment Program is included in the Pretreatment Program Summary, Part 3, Item 1.

Program Element 14

Pursuant to its approved pretreatment program, the District must submit a report of its pretreatment program activities, annually, to the USEPA and the IEPA.

This report satisfies the annual reporting requirement for calendar year 2004.