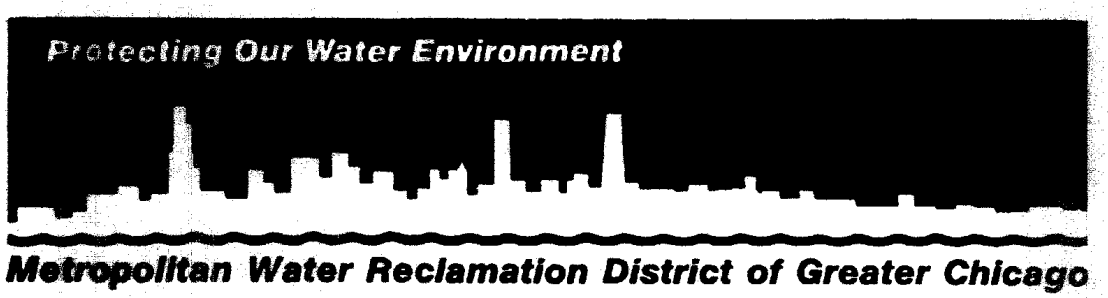

Metropolitan Water Reclamation District of Greater Chicago

RESEARCH AND DEVELOPMENT DEPARTMENT

REPORT NO. 2000-1

CALCULATION OF USER CHARGE RATES AND EXTRAORDINARY MONITORING AND ENFORCEMENT COSTS AND CHARGES FOR 2000

January 2000

Metropolitan Water Reclamation District of Greater Chicago
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CALCULATION OF USER CHARGE RATES AND EXTRAORDINARY MONITORING AND ENFORCEMENT COSTS AND CHARGES FOR 2000

Research and Development Department
Richard Lanyon, Director

January 2000

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USER CHARGE RATES CALCULATION

October 7, 1999

CALCULATION OF 2000 USER CHARGE RATES

Determination of Total OM&R Cost

The 1999 Metropolitan Water Reclamation District of Greater Chicago (District) Corporate Fund appropriates $301,800,000 for the support of operations and maintenance to carry out wastewater treatment and other functions. After subtracting the appropriations of those items disallowed by the USEPA in the 1979 rate calculations, it is determined that $283,935,982 of the 1999 budget was OM&R related. A breakdown of this total is shown in Table 1.

The segregation of costs associated with wastewater treatment from costs associated with other functions is based on discussions regarding the District's dedicated ad valorem tax revenues, which were held in September and October 1978, between the District staff and the USEPA staff. In these discussions, non-OM&R budgeted line items were identified and eliminated.

For example, the non-OM&R items eliminated included the following programs:

4200 Waterways Control and Stormwater Retention Reservoirs
4210 Maintenance of Waterways
4700 Flood and Pollution Control Design
4800 Flood and Pollution Control Construction

These programs relate to corporate expenditures for waterways operation and maintenance and flood control design and construction. The total of the above eliminated programs is $13,600,466. In addition to this amount, a prorated portion of Program 7000, General Support, is also eliminated because it is the overhead support of the items eliminated from Program 4000. The portion of Program 7000 thus eliminated is $4,563,552. The total of the eliminated funds considered to be non-OM&R related is $18,164,018. Three additional funds, portions of the Annuity and Benefit Fund ($22,826,920), the Reserve Claim Fund ($4,478,000), and the Construction and Working Cash Fund ($6,183,725) are added to the OM&R costs, raising the total OM&R cost from $283,935,982 to $317,424,624. These funds are added because they relate to OM&R costs. The Annuity and Benefit Fund provides for the District's pension program for retired employees and employee disability payments. The Reserve Claim Fund is used for the payment of workmen's compensation, liability claims, and other associated costs. This fund is also used to pay for repair costs if a catastrophe were to strike the District's facilities.

Up until the 1960's, the Construction Fund had been used as a repair and replacement funding mechanism. The use of this fund was suspended because the District embarked on a major program to upgrade its infrastructure, consisting primarily of expansion

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 1

TOTAL OM&R COST FOR 1999 & 2000

Budgeted Corporate Fund Programs Directly Related to OM&R Costs	1998 Budget	1999 Budget
1000 Collection	$ 42,200,000	$ 65,200,000[1]
2000 Treatment	56,400,000	61,600,000[1]
3000 Solids Processing	34,300,000	34,800,000[1]
4000 Flood and Pollution Control	23,245,247	24,399,534[1,2]
5000 Solids Utilization	25,700,000	26,600,000[1]
7000 General Support	69,333,910	71,336,448[1,3]
Sub-Total	$ 251,179,157	$ 283,935,982
Annuity and Benefit Fund	22,609,035	22,826,920[4]
Reserve Claim Fund	4,365,812	4,478,000[5]
Construction & Working Cash Fund	8,577,995	6,183,725[6]
Sub-Total	$ 35,552,842	$ 33,488,645
Total OM&R Cost	$ 286,731,999	$ 317,424,627

[1]See Pages 45, 223 and 239 of the District's 1999 Budget.
[2]Program total in Corporate Fund is $38,000,000. USEPA disallowed costs (Programs 4200, 4700, and 4800) are $13,600,466, leaving a net of $24,399,354.
[3]Program total in Corporate Fund is $75,900,000. USEPA disallowed costs are $4,563,552, leaving a net of $71,336,448. A prorated portion of program 7000, General Support, was eliminated as it was determined in the 1979 User Charge Proposal that this portion was related to the overhead support of items disallowed from Program 4000. This prorated portion is the ratio of the disallowed amount ($13,600,466) to the total for Programs 1000 through 5000 ($226,200,000) in the 1999 Budget.
[4]The 1999 Budget allocates $24,427,062 to the Annuity and Pension Fund. Approximately 6.55% of the District's employees and their expenses are not chargeable to the Corporate Fund. The 6.55% number represents the ratio of the salaries budgeted under Programs 4200, 4210, 4700 and 4800 against the total salaries budgeted under Programs 1000, 2000, 3000, 4000 and 5000.
[5]From Table 1A on Page 3.
[6]From Table 1C on Page 6.

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 1A

RESERVE CLAIM FUND

1999 Budget	$12,600,000
Less 1998 Budget	$10,800,000
Plus 1998 Actual Claims	$ 2,678,000
Total	$ 4,478,000

Note: Included for the User Charge System are actual expenditures in 1998 plus the amount added to the fund which is the difference in the budget appropriations for 1998 (Page 47 of 1998 Budget) and 1999 (Page 47 of 1999 Budget). The total represents the funding required to bring the fund up to the 1999 appropriated amount. The data for actual claims was provided by the Finance Department on April 13, 1999.

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 1B

CONSTRUCTION FUND COSTS

Budgeted Programs Directly Related to OM&R Cost	1998 Budget
1000 Collection	$ 16,796,232
2000 Treatment	53,246,268
3000 Solids Processing	30,738,745
4000 Flood and Pollution Control	18,678,068
5000 Solids Utilization	952,346
Subtotal of Programs 1000 through 5000	$120,411,659
Less ineligible portion of OM&R Cost Applicable to programs 4200, 4210, 4700 and 4800	18,678,068
Eligible OM&R Cost from Programs 1000 through 5000	101,733,591
Ratio of eligible to total program cost $\frac{\$101,733,591}{\$120,411,659} = 0.845$	
7000 Plus General Support (eligible portion)= 0.845 x 731,541	618,152
Total Eligible OM&R Cost	$102,351,743

Sources: BF3 recap by program provided by General Administration on August 10, 1999.

and improvement of water reclamation plants, construction of new water reclamation plants and collections systems and implementation of the Tunnel and Reservoir Plan, the District's solution to combined sewer overflows. Funding for these major capital improvement projects in the Capital Improvements Bond Fund included issuance of long-term debt as authorized by the State of Illinois.

Suspending use of the Construction Fund was appropriate at the time, since funding for capital improvement projects came through the issuance of long-term debt recovered under ad valorem taxes, and replacement costs were recovered by way of the designated fixed asset replacement set aside in the Corporate Fund. The designation for fixed asset replacement funding was negotiated with the USEPA in the original User Charge System (UCS) as a mechanism for identifying and recovering infrastructure replacement costs, etc.

Beginning with 1997, it was determined that the eligible portions of the Construction Fund and the financing charges for related working cash funds would be included in the OM&R cost. The eligible portion of the Construction Fund, etc. is now designated for "fixed asset replacement."

The Engineering Department has determined that the eligible portion of the Construction Fund from the 1999 budget is $14,665,415, as shown on Table 1D, Page 7. The 1999 Construction Working Cash Fund is $3,558,812. (See Page 77 of the 1999 Budget). The total of these two funds is further adjusted for the Construction Fund revenues and ineligible 4000 Program costs, and the eligible portion to be included in the OM&R costs was determined to be $6,183,725, as shown on Table 1C.

Determination of Total Revenue to be Generated by User Charge System in 1999

As shown in Table 2, revenues contained in the 1998 budget derived from sources other than the proposed User Charge system total $96,801,713. Deducting this amount from the total OM&R cost of $317,424,627 leaves $220,622,914 to be generated by the User Charge system in 2000, a 1.5% change from the $217,282,747 which was to be generated in 1999. The revenue derived from other sources from the sale or use of the District's assets, and other sources itemized in Table 2. Such revenues are used in the District's budget preparation process to offset the overall tax levy and the amount to be generated by the User Charge system.

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 1C

DETERMINATION OF TOTAL OM&R COST
CONSTRUCTION FUND PORTION ADJUSTED FOR REVENUES
FROM OTHER SOURCES

Revenue/Cost Item	For 2000 from 1999 Budget
Net Assets Appropriable	$ 67,691,300.00
Revenue from Current Services	
Grants	$ 1,000,000.00
Revenue from Personal Property	
Replacement Tax	$ 4,679,072.00
Reimbursement from Corporate Fund	
for Payroll and Indirect Costs	$ 1,811,700.00
Revenue from Money and Property	
Investment Income and Misc.	$ 5,000,000.00
Total Revenues Derived from	
Other Sources	$ 80,182,072.00
Construction Fund	
Total Costs (from Table 1B on page 4)	$ 102,351,743.00
Ratio of Revenues vs. Construction	
Fund ($80,182,072/$102,351,743)	0.7834
Eligible Construction Fund as	
Furnished by Engineering Dept.	$ 14,665,415.00
(From Table 1D on page 7)	
Less Proportionate Share for Revenues	$ 11,488,886.00
(0.7834 x $14,665,415)	
Net Eligible Construction Fund	$ 3,176,529.00
Net Eligible Portion of Construction Working	
Cash Fund = 0.845 x $3,558,812 as	$ 3,007,196.00
explained on page 4 & 5	
OM&R Cost to be Recovered for	
Construction Fund	$ 6,183,725.00

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 1D

1999 CONSTRUCTION FUND REPLACEMENT COST

PROJECT NUMBER	PROJECT TITLE/ DESCRIPTION	ELIGIBLE APPROPRIATION	% ELIGIBLE / TOTAL	IN-HOUSE COST
98-516-2P	Hanover WRP Lagoon Piping Replacement	$ 1,200,000	100	$ 51,200
96-111-2E	Mainstream P.S. Trashrake Controls Improvement	$ 1,328,550	85	$ 90,950
98-263-2P	CWRP Replace Grit Piping and Pumps	$ 750,000	100	$ 65,000
94-453-2P	Egan WRP Steel Roof Decks for Digesters A to D	$ 2,367,000	100	$291,000
97-155-2P	SWRP Water System Upgrade	$ 570,000	100	$ 45,000
96-458-2P	Kirie WRP Replace Control System	$ 2,310,000	100	$146,000
96-118-2P	SWRP Replace Diffuser Piping Battery C	$ 550,000	100	$ 38,500
95-455-2P	Egan WRP Expansion and Replace Control Systems	$ 691,000	30	$ 30,215
97-088-TM	NSWRP Replace Fine Screens	$ 3,000,000	100	$178,000
96-081-2E	NSWRP Replace Control Panels	$ 900,000	100	$ 63,000
TOTALS		$13,666,550		$998,865
TOTAL		$14,665,415		

Source: Engineering Department memo dated June 28, 1999.

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 2

DETERMINATION OF TOTAL OM&R COST FOR 1998 AND 1999
ADJUSTED FOR REVENUES FROM OTHER SOURCES
AND FOR ADMINISTRATIVE COST

Revenue/Cost Item	For 1999 From 1998 Budget	For 2000 From 1999 Budget
Total OM&R Cost[1]	$286,731,999	$317,424,627
Less:		
Net Assets Appropriable[2]	35,686,697	59,414,457
Revenue from Money and Property[2]	8,900,000	11,200,000
Revenue from Current Services Other than User Charge and Bond Fund Reimbursements[2]	161,000	181,000
Revenue from Personal Property Replacement Tax[2]	18,753,500	18,510,256
Reimbursement from Bond Fund[2]	3,451,000	3,970,000
Revenue from Miscellaneous Sources[2]	2,497,055	3,026,000
Connection Impact Fee[2]	--	500,000
Administrative Cost[3,4]	11,849,922	12,092,952
Subtotal of Revenues from Other Sources and Administrative Costs	81,299,174	108,894,665
Adjusted Total OM&R Cost	$205,432,825	$208,529,962
Rounded Off Figure	$205,433,000	$208,530,000

Sources: [1]From Table 1 on page 2.
[2]From pages 81 and 82 of 1998 Budget and pages 81 and 82 of 1999 Budget.
[3]Does not include Fines which are addressed under Administrative costs and Extraordinary Monitoring and Enforcement costs.
[4]The total of costs from pages 137 (4660, R&D), 196 (4660, Law) and 210 (7393, Finance) of the 1999 Budget.

Determination of 1999 User Charge Administration Cost for Each User Charge Class

Table 3 presents the costs of administration of the User Charge system, distributed according to class. The actual 1998 cost is $7,817,000. The 1999 budgeted cost of $12,092,952 is subtracted from the total OM&R cost of $220,622,914 resulting in a net OM&R cost of $208,529,962 (rounded off $208,530,000), which must be collected by the User Charge system. Later, the actual 1998 administration cost for each class will be added to its respective class cost to compute the final class cost and resulting rates.

Unit Costs of Treatment

District operating records indicate that 521,859 MG of flow, 695,576 Klbs of BOD, and 1,036,289 Klbs of SS were treated during 1998 (data from 1998 Water Reclamation Plant operating records as compiled by the R&D Department). Operating cost accounting data was used to determine the allocation of OM&R costs by parameter; i.e., flow, BOD and SS. The result is that 28.123 percent of the cost is attributed to flow, 37.328 percent to BOD, and 34.549 percent to SS (from Finance Department Report CMSRO2 dated January 28, 1999). Using the foregoing data, the Unit Costs of treatment are derived, as shown in Table 4.

These unit costs of treatment will be used in the subsequent analysis for distributing costs by class and in distributing the costs of treating Infiltration/Inflow (I/I) and storm water. The basis of the District's User Charge system is its cost to treat each gallon of flow, each pound of BOD, and each pound of SS.

Distribution of Equalized Assessed Valuations and Quantities by Source

The source of loadings to the District and the assessed valuations for these sources are shown in Table 5.

The District utilizes a 1997 total equalized assessed value (EAV) for its service area of $73,860,000,000. This includes railroad property. Through a review and evaluation of all tax credits claimed by Large Commercial-Industrial and Tax-Exempt Users in 1998, based on their 1997 ad valorem property taxes, it was established that the EAV of the Large Commercial-Industrial sources was $5,681,492,905. The EAV of Tax-Exempt Users was $5,520,177. These are based on the most recently updated verified User data in the District's files and is for tax year 1997 payable in 1998. Some Tax-Exempt Users pay property taxes on their facilities, which they report on their annual certified statements. Subtracting the EAV of the Large Commercial-Industrial Users ($5,681,492,905) and the EAV of the Tax-Exempt Users ($5,520,177) leaves a total EAV of $68,172,986,918 for the Residential and Small Nonresidential Commercial-Industrial Users.

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 3

TOTAL COST FOR ADMINISTRATION
OF USER CHARGE AND SEWAGE AND WASTE CONTROL ORDINANCES

Cost to Administer Pretreatment/Sewage and Waste Control Ordinance	Cost 1998
Final Enforcement-Sewage and Waste Control Ordinance (Program 4662) Costs[1,3]	$3,776,972.00
Law Department (Program 4662) Costs[1]	0.00
Total Cost to Administer Pretreatment/Sewage and Waste Control Ordinance	$3,776,972.00
Cost to Administer User Charge Ordinance	
Final User Charge (Program 4663) Costs[1]	$3,519,063.00
Finance Department (Program 7393) Costs[1]	$ 159,271.00
Law Department (Program 4663) Costs[1]	$ 361,592.00
Total Cost to Administer User Charge Ordinance	$4,039,926.00
Total Administration Costs (Sum of Costs to Administer Pretreatment/Sewage and Waste Control and User Charge Ordinances)	$7,816,898.00

COMPUTATIONS OF COSTS FOR ADMINISTRATION OF USER CHARGE
AND SEWAGE AND WASTE CONTROL ORDINANCES

Tabulation of Costs Assigned to User Classes by Project Number

Project Number	Cost 1997	Cost 1998
Large Commercial-Industrial[1,3]	$ 4,492,780.00	$4,704,534.00
Small Commercial-Industrial[1]	52,889.00	48,604.00
Tax-Exempt[1]	70,183.00	83,655.00
Total Cost Assigned to User Class Project Numbers	$ 4,615,852.00	$4,836,793.00
Computation of Unassigned Program Costs		
Total Administration Costs for Sewage and Waste Control and User Charge	$ 7,645,715.00	$7,816,898.00
Total Costs Assigned to User Class Project Numbers	$ 4,615,852.00	$4,836,793.00
Total Costs not Assigned to User Class Project Numbers	$ 3,029,863.00	$2,980,105.00

Table continued on following page

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 3 (Continued)

TOTAL COST FOR ADMINISTRATION
OF USER CHARGE AND SEWAGE AND WASTE CONTROL ORDINANCES

Allocation of Total Costs not Assigned to User Classes by Project Number to Appropriate User Classes

Project Number		Cost Allocated (1998)
Large Commercial-Industrial: 4,704,534 x 2,980,105/4,836,793	= $	2,898,616.00
Small Commercial-Industrial: 48,604 X 2,980,105/4,836,793	= $	29,947.00
Tax-Exempt: 83,655 x 2,980,105/4,836,793	= $	51,543.00
TOTAL	$	2,980,106.00

Administration Cost by Class

Large Commercial-Industrial	$ 4,704,534	+	$ 2,898,616	= $	7,603,150.00
Small Commercial-Industrial	$ 48,604	+	$ 29,947	= $	78,551.00
Tax-Exempt	$ 83,655	+	$ 51,543	= $	135,198.00
TOTAL				$	7,816,899.00
Rounded Off Figure[2]				$	7,817,000.00

[1]The program costs are taken from the District's Finance Department Cost Analysis System Program Costs by organization and fund. The project costs are taken from the District's Project Cost Accounting System (PCA) records for 1998.

[2]This figure includes both User Charge costs and Enforcement costs.

[3]The part of the 1998 Pretreatment Program Cost attributable to the Extraordinary Monitoring and Enforcement (EME) activities was determined to be $2,309,502 and is not included herein. The EME Charges are recovered from significant industrial users in 16 federal pretreatment categories regulated for metals of concern (including also civil penalties and late filing fees). In 1998, the total unrecovered EME is $2,092,674, which must be recovered in 2000 by the User Charge System.

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 4

UNIT COST OF TREATMENT

Total District Loadings for 1998*

Volume	=	521,859	MG
BOD	=	695,576	Klbs
SS	=	1,036,289	Klbs

Total OM&R Cost = $208,530,000

Allocation of Cost According to Parameters of Flow, BOD & SS**

Flow	=	28.123%	x $208,530,000	= $58,644,892
BOD	=	37.328%	x $208,530,000	= $77,840,078
SS	=	34.549%	x $208,530,000	= $72,045,030

Unit Costs of Treatment

Volume	=	$ 58,644,892	/	521,859	MG	=	$ 112.38	/ MG
BOD	=	$ 77,840,078	/	695,576	Klbs	=	$ 111.91	/ Klbs
SS	=	$ 72,045,030	/	1,036,289	Klbs	=	$ 69.52	/ Klbs

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*The 1998 District loadings are used in the calculation of 2000 rates, because this is the latest full year's operating data at the time the calculations were made. (Source: R&D Department Water Reclamation Plant 1998 Operating Records.)

**Percent distribution of cost-to-load parameters derived from the Finance Department CMSRO2 Report of January 28, 1999.

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 5

DISTRIBUTION OF EQUALIZED ASSESSED VALUATIONS AND QUANTITIES BY SOURCES

Source	Equalized Assessed Valuation ($)	Volume (MG)	BOD (Klbs)	SS (Klbs)
Residential and Small Nonresidential Commercial-Industrial	$68,172,986,918**	283,944	281,803	397,840
Large Commercial-Industrial	$ 5,681,492,905**	30,035	151,637	56,773
Tax-Exempt* (and Governmental)	$ 5,520,177**	11,484	19,062	71,557
I/I, Rain and Recycle (Table 6)		196,396	243,074	510,119
Total (Approximate Due to Roundoff)	$73,860,000,000***	521,859	695,576	1,036,289

*The quantities shown on these lines constitute the billable flows and loads for the classes indicated.

**EAV is based on actual tax credits reported to District Users. The tax credit data was taken from the 1998 annual statements filed by the Users. This data is verified by ad valorem tax bills submitted with the annual statements. $25,623,533 in 1998 real estate taxes were claimed by Large Commercial-Industrial Users for 1998, and the District's 1997 tax rate was 45.1 cents per $100 of EAV. Therefore, $25,623,533/0.4510 x $100 = $5,681,492,905, the imputed EAV of the Large Commercial-Industrial Class. Similarly, Tax Exempt Users paid taxes of $24,896 on certain parcels which were not exempt. Based on this tax paid, the EAV of the tax-exempt owned property was $24,896/0.4510 x $100 = $5,520,177. Based on this tax paid, the EAV of the Residential and Small Nonresidential Commercial-Industrial Class is computed by deducting all other figures from the total EAV.

***Total EAV is for the year 1997 as supplied by the County Assessor, Multiplier = 2.1489.

Allocation of Rain, I/I and Recycle

As stated earlier, the total quantities of flow, BOD and SS are determined from District operating records. Following is an explanation of how these quantities were allocated to the four sources of Residential and Small Nonresidential Commercial-Industrial, Large Commercial-Industrial, Tax-Exempt, and I/I, Rain, and Recycle, as shown in Table 5.

It was noted that, in the rates for the years prior to 1987, the Recycle item was not included. This item was introduced in the 1987 User Charge rate calculations for BOD and SS, because failure to include this item results in disproportionately high and improper assignment of BOD and SS concentrations and total loadings to the Residential and Small Nonresidential Commercial-Industrial (R&SNC-I) class. This item was designated "Recycle" because, currently, samples of plant loadings include substantial "loadings" due to recycle of in-plant waste streams and thus do not adequately reflect User-generated loadings. In the 1999 calculations, the recycle flow volume was established as 31.32 MGD or 11,432 MG/year, based on an April 6, 1999 memorandum from the M&O Department providing the 1998 recycle flow volume.

The initial BOD and SS loadings assigned to the R&SNC-I Class in Table 5, prior to the allocation of I/I, Rain and Recycle in Table 6, are computed based on the volume for the R&SNC-I Class listed in Table 5 (computed as in prior years), and the standard domestic values of 119 mg/L for BOD and 168 mg/L for SS as specified in Section 7f of the User Charge Ordinance. I/I, Rain and Recycle flows in Table 6 were determined to be 196,396 MG per year.

Analysis of Dry- and Wet-Weather Flows

The method of determining dry and wet-weather flows in the 1999 and 2000 rate-setting process has been revised from the method used in the rate calculations for 1998 and previous years. For rate settings prior to 1982, rain-attributed loads were derived by extracting all loads received at a WRP on a day with 0.10 inches of precipitation or more, projecting the remaining loads over 365 days, and subtracting this value from total WRP flows. This method, however, does not account for rain loads received days after a storm due to the lag time required for flows to arrive from the perimeter of a collection area.

In the 1982 through 1989 rate calculations, rain-attributed flows were determined by an analysis of the daily plant operating records for a previous year. For the 1986 through 1989 rate calculations, the records for 1985 were used. Because the dry-weather flow is thought to be relatively stable, it was felt that a separate determination each year was not warranted. The month in 1985 exhibiting the lowest total precipitation was identified. The month of January 1985 was chosen because it has these charac-

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 6

ALLOCATION OF I/I, RAIN, AND RECYCLE

Class Loadings	Flow (MG)	%	BOD (Klbs)	%	SS (Klbs)	%
Dry-Weather Loadings						
Residential and Small Nonresidential Commercial-Industrial+	283,944	87.24	281,803	62.28	397,840	75.61
Large Commercial-Industrial+	30,035	9.23	151,637	33.51	56,773	10.79
Tax-Exempt (and Governmental)	11,484	3.53	19,062	4.21	71,557	13.60
TOTAL	325,463	100	452,502	100	526,170	100
Allocating I/I, Rain And Recycle						
Residential and Small Nonresidential Commercial-Industrial	171,336		151,386		385,701	
Large Commercial-Industrial*	18,127		81,454		55,042	
Tax-Exempt (and Governmental)	6,933		10,233		69,376	
TOTAL**	196,396		243,074		510,119	
GRAND TOTAL*** (Approximate; roundoff)	521,859		695,576		1,036,289	

+Residential and Small Nonresidential Commercial-Industrial (R&SNC-I) flows are derived by subtracting rain, I/I and recycle figures as well as known Large Commercial-Industrial and Tax-Exempt loads from the grand totals. Standard domestic sewage concentrations of 119 mg/L for BOD and 168 mg/L for SS are used (as specified in Section 7f of the User Charge Ordinance) and have been applied to the volume so derived to establish the R&SNC-I BOD and SS loadings, respectively.

*These numbers were arrived at from the District's records of all 1998 User Charge Annual Certified Statements.

**Daily M&O Department records for the District's seven WRPs for the year 1998 show a total volume treated of 521,859 MG. The projected annual dry-weather volume is 923 x 365 days = 336,895 MG. I/I, Rain and Recycle flows are equal to Total Flow (521,859 MG) minus Dry-Weather Flow (336,895 MG), or 184,964 MG plus Recycle (11,432 MG) = 196,396 MG. See page 14 for an explanation of the Recycle item as first introduced in the 1987 User Charge rate calculations. Totals may not equal sum of components due to rounding.

***Grand totals come from 1998 operating records as explained on page 12.

teristics and, therefore, represented a baseline condition. The flow and pound loadings for each day during this month were calculated and totaled for the month. The monthly sums were then divided by the number of days in the month.

The difference between total dry-weather load and the total load was considered to be the wet-weather or rain load. For the 1990 through 1998 rate calculations, the Rain and I/I flows were determined by using 1988 plant operating data. The operating records from each WRP were screened to find the five lowest flow days. These days were averaged and used as dry-weather flow for each of the seven WRPs. The seven WRPs were tabulated to give a District-wide daily dry-weather flow quantity of 911 million gallons per day. The tabulated daily dry-weather flow was converted into an annual volume.

However, for the 1999 rate calculations, it was decided to update the dry-weather flow quantity and methodology, because the 1988 data was now ten years old and the method did not account for changes which may reasonably occur over time. Therefore, for 1999 and thereafter, the User Charge rate calculation will utilize the average of the five lowest days for each of the last five years for which flow data is available to identify the average dry-weather flow. WRP flow data is available for 1994 through 1998 for the 2000 rate calculations. For each WRP the five lowest days for each year are averaged for each of the five available years. A summary of this tabulation is shown on Table 7.

Based on 1994 through 1998 Plant operating data, the average daily dry-weather flow is 923.34 million gallons per day (MGD) (rounded off to 923 MGD). The highest year is 1997 with a DWF of 939.90 MGD, while the lowest year was 1995 with 890.73 MGD.

The advantages of this method are as follows:

1. Each of the District's plants will have 25 data points (five low days for each of the five years).

2. This five-year average will be based on the most current available WRP operating data. For the 2000 rate calculation, this will be 1994 through 1998.

3. By adopting this method for determining District dry-weather flows, wide swings in the flow volume from year to year will be avoided and stability in the rate calculation process is maintained.

Volumes attributed to I/I, Rain and Recycle are:

Flow = 521,859 - 336,895 + 11,432 = 196,396 MG

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 7

DRY-WEATHER FLOW

1994 THROUGH 1998

WRP	1994	1995	1996	1997	1998	5-Year Average
Stickney	530.00	544.00	517.00	547.00	504.00	528.40
North Side	185.00	112.00	203.90	173.06	198.00	174.39
Calumet	181.00	187.00	170.00	171.00	169.00	175.60
Egan	15.60	19.10	17.30	19.00	16.30	17.46
Hanover	3.34	5.44	4.81	5.78	5.25	4.92
Kirie	20.72	22.18	19.00	22.99	22.69	21.52
Lemont	1.00	1.01	0.96	1.07	1.21	1.05
Total	936.66	890.73	932.97	939.90	916.45	923 MGD

Distribution of I/I, Rain, and Recycle OM&R Costs

As shown in Table 5 on page 13, there are four sources of loadings to the District's WRPs. However, under the ad valorem tax system, there are only two sources which contribute toward OM&R costs: the Residential and Small Nonresidential Commercial-Industrial User classes and the Large Commercial-Industrial User class. Of the two remaining sources, namely, the Tax-Exempt class, and I/I, Rain and Recycle, only the Tax-Exempt class source can contribute toward the payment of the OM&R costs. The OM&R costs to treat flows and loads from the remaining source, I/I, Rain, and Recycle are distributed to the Residential and Small Nonresidential Commercial-Industrial, Large Commercial-Industrial and Tax-Exempt classes in proportion to the dry-weather loads and flows contributed by these three regulatory classes. The results of the distribution of loads and flows are shown in Table 6.

Calculation of Rates for the Large Commercial-Industrial and Tax-Exempt Classes

After allocating the I/I, Rain, and Recycle-attributed flows to the three classes, a cost for each class is calculated by multiplying each class parameter quantity by the unit cost generated in Table 4 on page 12. The results of these calculations are shown in Table 8. Please note that the class totals shown include the administrative cost for each class distributed to volume, BOD and SS in proportion to the total other costs, for each parameter, for each class. These costs, totaling $216,348,022 must be recovered by the District through the ad valorem (real estate) tax system and User surcharges.

In summary, the total OM&R cost by class is:

Residential and Small Non-residential Commercial-Industrial	$154,192,868
Large Commercial-Industrial	46,874,189
Tax-Exempt	15,280,965
TOTAL	$216,348,022

The Residential and Small Nonresidential Commercial-Industrial classes' OM&R costs are collected through the District's dedicated ad valorem tax system. Using the equalized assessed class value of $68,172,986,918 for the Residential and Small Nonresidential Commercial-Industrial classes as shown in Table 5, and the class OM&R cost of $154,192,868 for the Residential and Small Nonresidential Commercial-Industrial classes, as shown in Table 8, the ad valorem residential OM&R rate for 2000 can be determined as follows:

$$\$154,192,868/\$68,172,986,918 = 0.226/\$100 \text{ EAV}$$

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 8

COST PER PARAMETER AND TOTAL COST PER USER CLASS FOR 2000 RATES

Class	Flow (MG)	BOD (Klbs)	SS (Klbs)	TOTAL
Residential and Small Nonresidential Commercial-Industrial	455,280	433,189	$ 783,541	
UNIT COST	$ 112.38	$ 111.91	$ 69.52	
COST	$51,164,366	$ 48,478,181	$ 54,471,770	$154,114,317
+ADMINISTRATION COST	$ 26,078	$ 24,709	$ 27,764	$ 78,551
CLASS TOTAL	$51,190,444	$ 48,502,890	$ 54,499,534	$154,192,868
Large Commercial-Industrial	48,162	233,091	111,815	
UNIT COST	$ 112.38	$ 111.91	$ 69.52	
COST	$ 5,412,446	$ 26,085,214	$ 7,773,379	$ 39,271,039
+ADMINISTRATION COST	$ 1,047,888	$ 5,050,281	$ 1,504,981	$ 7,603,150
CLASS TOTAL	$ 6,460,334	$ 31,135,495	$ 9,278,360	$ 46,874,189
Tax-Exempt (and Governmental)	18,417	29,295	140,933	
UNIT COST	$ 112.38	$ 111.91	$ 69.52	
COST	$ 2,069,702	$ 3,278,403	$ 9,797,662	$ 15,145,767
+ADMINISTRATION COST	$ 18,475	$ 29,265	$ 87,458	$ 135,198
CLASS TOTAL	$ 2,088,177	$ 3,307,668	$ 9,885,120	$ 15,280,965
TOTAL COST				$216,348,022

This constitutes the OM&R rate for all classes under the ad valorem tax system and represents 4.2 percent reduction from the 1999 rate of 0.235/$100 EAV.

In the collection of ad valorem tax revenues, the Cook County Treasurer has experienced a shortfall over the years due to delinquencies. The actual extent of this shortfall is unknown. To compensate for this shortfall, however, it is customary for taxing bodies to increase their tax levies by an amount which approximates the shortfall. The District's budget for 1999 includes a 2.5 percent allowance for tax revenues uncollected in the year of levy.

The calculation of the ad valorem residential OM&R rate of 0.226/$100 EAV is without the allowance for uncollectibles. This rate adjusted by 2.5 percent for uncollectibles would be 0.220/$100 EAV. The adjusted ad valorem OM&R rate is 48.8 percent (0.220/0.451) of the estimated total 1997 ad valorem tax rate.

The User Charge rates for the Large Commercial-Industrial class are equal to the total cost per parameter for this class divided by the billable flow and loads, as shown in Tables 5 and 8. Using this data, the following rates are established for the Large Commercial-Industrial User class:

Flow:	$ 6,460,334/30,035	MG	=	$215.09/MG
BOD:	$31,135,495/151,637	Klbs	=	$205.33/Klbs
SS:	$ 9,278,360/56,773	Klbs	=	$163.43/Klbs

The Tax-Exempt class OM&R costs must be fully collected by the User Charge System. Using the total cost per parameter for this class divided by the billable flow as shown in Tables 5 and 8 the following rates are established for the Tax-Exempt User class:

Flow:	$ 2,088,177/11,484 MG	=	$181.83/MG
BOD:	$ 3,307,668/19,062 Klbs	=	$173.52/Klbs
SS:	$ 9,885,120/71,557 Klbs	=	$138.14/Klbs

The proposed 2000 rates compare with current 1999 rates as follows:

Class Parameters	2000	1999	% Change
Large Commercial-Industrial			
Flow $/MG	$215.09	$205.63	+4.60
BOD $/Klbs	$205.33	$196.13	+4.69
SS $/Klbs	$163.43	$160.40	+1.89

Class Parameters	2000	1999	% Change
Tax-Exempt			
Flow $/MG	$181.83	$175.13	+3.83
BOD $/Klbs	$173.52	$167.04	+3.88
SS $/Klbs	$138.14	$136.61	+1.12
OM&R Factor	0.488	0.451	+8.20

Prepared by Donald J. Byrn Date 12/21/1999

Checked by [signature] Date 12/21/1999

Approved by [signature] Date 12-21-99

EXTRAORDINARY MONITORING AND ENFORCEMENT COSTS AND CHARGES CALCULATION

EXTRAORDINARY MONITORING AND ENFORCEMENT COSTS AND CHARGES FOR THE YEAR 2000--DETERMINATION OF TIER ASSESSMENTS

Introduction

On October 6, 1994, the Board of Commissioners (Board) of the Metropolitan Water Reclamation District of Greater Chicago (District) amended the User Charge Ordinance to include a new User Charge parameter designated as Total Metals of Concern (TMC). The intent of this amendment was to establish a more equitable distribution and recovery of District Pretreatment Program costs incurred through extraordinary monitoring and enforcement (EME) activities. EME Charges were recommended to the District's Board after a series of meetings between the District's staff and representatives of the Chicagoland Chamber of Commerce and the Illinois Manufacturers Association resulted in a consensus regarding the equity and methodology by which such charges would be assessed.

EME Charges apply only to those companies that are classified by the District as Significant Industrial Users (SIUs) subject to categorical pretreatment standards for one or more of the following metals of concern: cadmium, chromium, copper, lead, nickel, and zinc. EME Charges have been assessed against this segment of the industrial community since 1995.

For any given year, the amount of monies to be recovered is based on the most recent and complete annual records available to the District (e.g., 1999 billings based on 1997 costs, 2000 billings based on 1998 costs). The EME costs for 1998 to be recovered in 2000 equals $2,092,674.34. The remainder of this report details the methodology and provides the data on which these costs are based.

Industrial User Category Definitions

Each industrial user within the District's jurisdiction falls under one of the following category definitions.

1. **TMC Categorical SIUs**: SIUs subject to categorical pretreatment standards that are regulated for one or more of the six TMC metals. Industrial categories regulated under categorical pretreatment standards for one or more of the TMC metals are listed in Table 9.

2. **Non-TMC Categorical SIUs**: SIUs subject to categorical pretreatment standards that are not regulated for any of the six TMC metals.

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 9

INDUSTRIAL CATEGORIES REGULATED FOR
ONE OR MORE TMC METALS

Category Description	Code of Federal Regulations Part Number
Electroplating	40 CFR 413
Organic Chemicals	40 CFR 414
Inorganic Chemicals	40 CFR 415
Petroleum Refining	40 CFR 419
Iron & Steel	40 CFR 420
Nonferrous Metal Manufacturing	40 CFR 421
Leather Tanning & Finishing	40 CFR 425
Metal Finishing	40 CFR 433
Battery Manufacturing	40 CFR 461
Metal Molding & Casting	40 CFR 464
Coil Coating	40 CFR 465
Porcelain Enameling	40 CFR 466
Aluminum Forming	40 CFR 467
Copper Forming	40 CFR 468
Electric & Electronic Products	40 CFR 469
Nonferrous Metal Forming & Metal Powders	40 CFR 471

3. **Non-Categorical SIUs**: SIUs that are significant, as defined by the District's Sewage and Waste Control Ordinance (Ordinance), but are not regulated by categorical pretreatment standards.

4. **Non-SIUs**: Industrial Users (IUs) which are not SIUs and, therefore, do not fall under any of the above defined categories.

All Industrial Waste Division (IWD) operations related to IUs fall under one or more of these user categories.

Enforcement Activities

The relative effort required to complete each task or operation under the District's Pretreatment Program has been defined as an activity unit (AU). This is not measured in absolute time, but can be considered relative time. In regards to Enforcement Section activities, AUs have been subdivided into minimal acceptable activity units (MAAUs) and extraordinary activity units (EAUs).

1. **MAAUs**: Activity units related to Pretreatment Program enforcement operations that are the minimum regulatory requirement even if all IUs are in full and continuous compliance with the Ordinance.

2. **EAUs**: Activity units related to enforcement operations undertaken subsequent to an IU having been found in violation of the Ordinance.

Minimum acceptable activities and extraordinary activities are listed in Table 10. Tables 11 through 14 show the number, unit effort, and AUs for each Enforcement Section operation shown on Table 10. Tables 11 through 14 are summarized as follows:

User Category	MAAU	EAU	Total AUs
TMC Categorical SIUs	3,372.25	629.25	4,001.50
Non-TMC Categorical SIUs	316.50	19.00	335.50
Non-Categorical SIUs	1,741.25	202.25	1,943.50
Non SIUs	793.00	159.50	952.50
Totals:	6,223.00	1,010.00	7,233.00

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 10

ENFORCEMENT SECTION OPERATIONS CLASSIFIED ACCORDING TO MINIMAL ACCEPTABLE ACTIVITIES AND EXTRAORDINARY ACTIVITIES

MINIMAL ACCEPTABLE ACTIVITIES

Review and Processing of
Discharge Authorization Requests

Review and Processing of
Continued Compliance Reports (RD-115s)

Review and Processing of
Spill Prevention, Control & Countermeasure Plans

Review and Processing of
Industrial Waste Generation & Disposal Reports (RD-300s)

EXTRAORDINARY ACTIVITIES

Notices of Noncompliance

Cease and Desist Orders

Show Cause Recommendations

Legal Action Recommendations

Referrals to the Law Department

Amendments to Enforcement actions

Compliance Date Revisions

Compliance Meeting Notifications

Delinquent Report Notifications

Rescinding of Enforcement Actions

Acceptable Report Notifications

Enforcement Action Related Correspondence

Meeting or Hearing

Compliance Schedule Review

Statement of Compliance Review

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 11

1998 PRETREATMENT PROGRAM COST RECOVERY
MINIMAL ACCEPTABLE ACTIVITY UNITS

TMC CATEGORICAL SIUs

Activity	Number	Unit Effort	Activity Units
DARs	70	7.00	490.00
RD-115s	655	3.00	1,965.00
SPCCs	25	7.00	175.00
IWGDs	2,969	0.25	742.25
			3,372.25

NON-TMC CATEGORICAL SIUs

Activity	Number	Unit Effort	Activity Units
DARs	5	7.00	35.00
RD-115s	56	3.00	168.00
SPCCs	4	7.00	28.00
IWGDs	342	0.25	85.50
			316.50

NON-CATEGORICAL SIUs

Activity	Number	Unit Effort	Activity Units
DARs	49	7.00	343.00
RD-115s	342	3.00	1,026.00
SPCCs	18	7.00	126.00
IWGDs	985	0.25	246.25
			1,741.25

NON-SIUs

Activity	Number	Unit Effort	Activity Units
DARs	5	7.00	135.00
RD-115s	2	3.00	6.00
SPCCs	9	7.00	63.00
IWGDs	2,756	0.25	689.00
			793.00

TOTAL MINIMAL ACCEPTABLE ACTIVITY UNITS: 6,223.00

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 12

1998 PRETREATMENT PROGRAM COST RECOVERY
EXTRAORDINARY ACTIVITY UNITS - EFFLUENT METALS NONCOMPLIANCE

TMC CATEGORICAL SIUs

ACTIVITY	NUMBER	UNIT EFFORT	ACTIVITY UNITS
CEASE & DESIST ORDERS	82	0.75	61.50
SHOW CAUSE RECOMMENDATION	2	5.00	10.00
REFERRAL TO LAW	43	2.00	86.00
AMENDMENT	147	0.75	110.25
NOTICE OF NONCOMPLIANCE	86	0.50	43.00
COMPLIANCE DATE REVISION	5	0.50	2.50
COMPLIANCE MEETING NOTIFICATION	3	0.50	1.50
TEN DAY LETTER	5	0.50	2.50
ENFORCEMENT ACTION RESCINDED	1	0.50	0.50
NOTIFICATION LETTER	7	1.00	7.00
MEETING OR HEARING	4	2.00	8.00
COMPLIANCE SCHEDULE	4	1.00	4.00
STATEMENT OF COMPLIANCE	92	0.50	46.00
			382.75

NON-TMC CATEGORICAL SIUs

ACTIVITY	NUMBER	UNIT EFFORT	ACTIVITY UNITS
CEASE & DESIST ORDERS	1	0.75	0.75
NOTICE OF NONCOMPLIANCE	2	0.50	1.00
STATEMENT OF COMPLIANCE	4	0.50	2.00
			3.75

NON-CATEGORICAL SIUs

ACTIVITY	NUMBER	UNIT EFFORT	ACTIVITY UNITS
CEASE & DESIST ORDERS	13	0.75	9.75
AMENDMENT	26	0.75	19.50
NOTICE OF NONCOMPLIANCE	26	0.50	13.00
NOTIFICATION LETTER	1	1.00	1.00
STATEMENT OF COMPLIANCE	22	0.50	11.00
			54.25

NON-SIUs

ACTIVITY	NUMBER	UNIT EFFORT	ACTIVITY UNITS
CEASE & DESIST ORDERS	16	0.75	12.00
REFERRAL TO LAW	3	2.00	6.00
AMENDMENT	16	0.75	12.00
NOTICE OF NONCOMPLIANCE	15	0.50	7.50
COMPLIANCE DATE REVISION	3	0.50	1.50
TEN DAY LETTER	1	0.50	0.50
NOTIFICATION LETTER	3	1.00	3.00
MEETING OR HEARING	1	2.00	2.00
STATEMENT OF COMPLIANCE	28	0.50	14.00
			58.50

TOTAL EXTRAORDINARY ACTIVITY UNITS
FOR EFFLUENT METALS NONCOMPLIANCE: 499.25

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 13

1998 PRETREATMENT PROGRAM COST RECOVERY
EXTRAORDINARY ACTIVITY UNITS - REPORTING NONCOMPLIANCE

TMC CATEGORICAL SIUs

ACTIVITY	NUMBER	UNIT EFFORT	ACTIVITY UNITS
CEASE & DESIST ORDERS	56	0.75	42.00
REFERRAL TO LAW	10	2.00	20.00
NOTICE OF NONCOMPLIANCE	6	0.50	3.00
COMPLIANCE DATE REVISION	1	0.50	1.00
COMPLIANCE MEETING NOTIFICATION	1	0.50	0.50
TEN DAY LETTER	10	0.50	5.00
NOTIFICATION LETTER	51	1.00	51.00
ACCEPTABLE REPORT NOTIFICATION	2	0.50	1.00
ENFORCEMENT ACTION RESCINDED	4	0.50	2.00
MEETING OR HEARING	15	2.00	30.00
COMPLIANCE SCHEDULE	6	1.00	6.00
STATEMENT OF COMPLIANCE	62	0.50	31.00
			192.50

NON-TMC CATEGORICAL SIUS

ACTIVITY	NUMBER	UNIT EFFORT	ACTIVITY UNITS
CEASE & DESIST ORDERS	5	0.75	3.75
NOTIFICATION LETTER	4	1.00	4.00
ENFORCEMENT ACTION RESCINDED	1	0.50	0.50
STATEMENT OF COMPLIANCE	4	0.50	2.00
			10.25

NON-CATEGORICAL SIUS

ACTIVITY	NUMBER	UNIT EFFORT	ACTIVITY UNITS
CEASE & DESIST ORDERS	26	0.75	19.50
NOTICE OF NONCOMPLIANCE	2	0.50	1.00
SHOW CAUSE RECOMMENDATION	1	5.00	5.00
REFERRAL TO LAW	1	2.00	2.00
COMPLIANCE DATE REVISION	2	0.50	1.00
TEN DAY LETTER	8	0.50	4.00
ENFORCEMENT ACTION RESCINDED	4	0.50	2.00
NOTIFICATION LETTER	17	1.00	8.50
MEETING OR HEARING	4	2.00	8.00
STATEMENT OF COMPLIANCE	30	0.50	15.00
			66.00

NON-SIUS

ACTIVITY	NUMBER	UNIT EFFORT	ACTIVITY UNITS
CEASE & DESIST ORDERS	10	0.75	7.50
REFERRAL TO LAW	2	2.00	4.00
MEETING OR HEARING	1	2.00	2.00
COMPLIANCE DATE REVISION	6	0.50	3.00
NOTIFICATION LETTER	26	1.00	26.00
COMPLIANCE SCHEDULE REVIEW	1	1.00	1.00
STATEMENT OF COMPLIANCE	11	0.50	5.50
			49.00

TOTAL EXTRAORDINARY ACTIVITY UNITS
FOR REPORTING NONCOMPLIANCE: 317.75

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 14

1998 PRETREATMENT PROGRAM COST RECOVERY
EXTRAORDINARY ACTIVITY UNITS - EFFLUENT NON-METALS NONCOMPLIANCE

TMC CATEGORICAL SIUS

ACTIVITY	NUMBER	UNIT EFFORT	ACTIVITY UNITS
CEASE & DESIST ORDERS	13	0.75	9.75
REFERRAL TO LAW	4	2.00	8.00
AMENDMENT	7	0.75	5.25
NOTICE OF NONCOMPLIANCE	21	0.50	10.50
NOTIFICATION LETTER	3	1.00	3.00
TEN DAY LETTER	1	0.50	0.50
MEETING OR HEARING	1	2.00	2.00
STATEMENT OF COMPLIANCE	30	0.50	15.00
			54.00

NON-TMC CATEGORICAL SIUS

ACTIVITY	NUMBER	UNIT EFFORT	ACTIVITY UNITS
CEASE & DESIST ORDERS	2	0.75	1.50
NOTICE OF NONCOMPLIANCE	3	0.50	1.50
STATEMENT OF COMPLIANCE	4	0.50	2.00
			5.00

NON-CATEGORICAL SIUS

ACTIVITY	NUMBER	UNIT EFFORT	ACTIVITY UNITS
CEASE & DESIST ORDERS	27	0.75	20.25
AMENDMENT	25	0.75	18.75
NOTICE OF NONCOMPLIANCE	43	0.50	21.50
COMPLIANCE DATE REVISION	1	0.50	0.50
NOTIFICATION LETTER	2	1.00	2.00
STATEMENT OF COMPLIANCE	38	0.50	19.00
			82.00

NON-SIUS

ACTIVITY	NUMBER	UNIT EFFORT	ACTIVITY UNITS
CEASE & DESIST ORDERS	20	0.75	15.00
AMENDMENT	8	0.75	6.00
NOTICE OF NONCOMPLIANCE	18	0.50	9.00
COMPLIANCE DATE REVISION	4	0.50	2.00
ENFORCEMENT ACTION RESCINDED	1	0.50	0.50
NOTIFICATION LETTER	4	1.00	4.00
COMPLIANCE SCHEDULE	1	1.00	1.00
STATEMENT OF COMPLIANCE	29	0.50	14.50
			52.00

TOTAL EXTRAORDINARY ACTIVITY UNITS FOR
EFFLUENT NON-METALS NONCOMPLIANCE: 193.00

Converting these values into percentages of total AUs allows one to observe the relative amount of activity for each User category, as follows:

User Category	MAAU	EAU	Total AUs
TMC Categorical SIUs	46.62%	8.70%	55.32%
Non-TMC Categorical SIUs	4.38%	0.26%	4.64%
Non-Categorical SIUs	24.07%	2.80%	26.87%
Non-SIUs	10.96%	2.21%	13.17%
Totals:	86.03%	13.97%	100.00%

By applying these percentages to the Enforcement Section's portion of the total 1998 Pretreatment Program expenditures, the following costs attributed to each of the four IU categories have been determined.

Minimal Acceptable Activity Expenditures:

User Category	Percent of Total AUs	Expenditures
TMC Categorical SIUs	46.62%	$900,965.08
Non-TMC Categorical SIUs	4.38%	84,646.65
Non-Categorical SIUs	24.07%	465,170.08
Non-SIUs	10.96%	211,809.89
		$1,662,591.70

Extraordinary Activity Expenditures:

User Category	Percent of Total AUs	Expenditures
TMC Categorical SIUs	8.70%	$168,133,77
Non-TMC Categorical SIUs	0.26%	5,024.69
Non-Categorical SIUs	2.80%	54,112.02
Non-SIUs	2.21%	42,709.84
		$269,980.32

Sampling Activities

In regards to Field Surveillance Section activities, a total of 44,557 samples were collected during 1998. Of that total, 34,237 samples were collected for trace metals.

Field Surveillance Section sampling activities (SA) have been subdivided into minimal acceptable sampling activities (MASA) and extraordinary sampling activities (ESA).

1. **MASA**: The minimum number of sampling events performed by the District at each categorical and non-categorical SIU as required by federal pretreatment program regulations; i.e., four samples, on separate days, from each final outfall ('A' stations) and each regulated pretreatment process outfall

('C' stations). For non-SIUs, there is no minimum required.

2. **ESA**: Includes sampling activities in response to incidents of noncompliance by IUs and more frequent sampling of IUs required for compliance with NPDES permit limits and Part 503 sludge regulations.

MASAs may be summarized as follows:

User Category	'A' Stations	'C' Stations	MASA ((A+C)x4)
TMC Categorical SIUs	494	88	2,328
Non-TMC Categorical SIUs	55	0	220
Non-Categorical SIUs	274	0	1,096
Non-SIUs	0	0	0
Totals:	823	88	3,644

Since all 1998 Field Surveillance Section sampling activities beyond MASA were extraordinary sampling events, the ESA is the difference between the total number of samples collected and the MASA. ESAs are summarized as follows:

User Category	MASA	ESA	Total Samples
TMC Categorical SIUs	2,328	17,141	19,469
Non-TMC Categorical SIUs	220	499	719
Non-Categorical SIUs	1,096	7,637	8,733
Non-SIUs	0	5,316	5,316
Totals:	3,644	30,593	34,237

Converting these values into percentages of the total 1998 sampling activity illustrates the following relative amount of sampling activity for each User category.

User Category	MASA	ESA	Total SAs
TMC Categorical SIUs	6.80%	50.06%	56.86%
Non-TMC Categorical SIUs	0.64%	1.46%	2.10%
Non-Categorical SIUs	3.20%	22.31%	25.51%
Non-SIUs	0.00%	15.53%	15.53%
Totals:	10.64%	89.36%	100.00%

By applying these percentages to the total 1998 Pretreatment Program (Program 4662) expenditures for the Field Surveillance Section, the Analytical Laboratory Division, and the Environmental Monitoring and Research Division, the following costs attributed to each of the four IU categories have been determined.

Minimal Acceptable Sampling Activity Expenditures:

User Category	Percent of Total SAs	Expenditures
TMC Categorical SIUs	6.80%	$273,543.98
Non-TMC Categorical SIUs	0.64%	25,745.32
Non-Categorical SIUs	3.20%	128,726.58
Non-SIUs	0.00%	0.00
		$428,015.88

Extraordinary Sampling Activity Expenditures:

User Category	Percent of Total SAs	Expenditures
TMC Categorical SIUs	50.06%	$2,013,766.44
Non-TMC Categorical SIUs	1.46%	58,731.50
Non-Categorical SIUs	22.31%	897,465.63
Non-SIUs	15.53%	624,726.18
		$3,594,689.75

Legal Activities

The remaining 1998 expenditures under Program 4662 were incurred by the Law Department. These expenditures were the result of extraordinary legal activities (ELAs); i.e., Show Cause and judicial actions against industrial users found in violation of the Ordinance. ELAs have been quantified by the number of Show Cause and judicial action recommendations and referrals transmitted to the Law Department. ELAs and associated 1998 expenditures attributed to each of the four User categories are summarized as follows:

User Category	ELA	Percentage of Total ELAs	Expenditures
TMC Categorical SIUs	71	97.26%	$127,601.64
Non-TMC Categorical SIUs	0	0.00%	0.00
Non-Categorical SIUs	2	2.74%	3,594.78
Non-SIUs	0	0.00%	0.00
Totals:	73	100.00%	$131,196.42

EME Cost for 2000

Table 15 summarizes minimal and extraordinary expenditures and quantifies 1998 total expenditures under Program 4662. Finally, Table 16 identifies 1998 Departmental expenditures under Program 4662 and compares Program and EME costs.

The total EME cost for 2000 is based on 1998 TMC Categorical SIU extraordinary expenditures minus accrued credits:

Extraordinary Activity Expenditures (EAE):	$168,133.77
Extraordinary Sampling Expenditures (ESE):	2,013,766.44
Extraordinary Legal Expenditures (ELE):	127,601.64
Civil penalties collected in 1998:	(148,312.51)
Late filing fees collected in 1998:	(68,515.00)
Total EME cost for 2000:	**$2,092,674.34**

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 15

PROGRAM 4662 - SEWAGE AND WASTE CONTROL
EXPENDITURES FOR 1998 BY USER CATEGORY

USER CATEGORY	MAAE	EAE	MASE	ESE	ELE	EXPENDITURES PER USER CATEGORY
TMC Categorical SIUs	$900,965.08	$168,133.77	$273,543.98	$2,013,766.44	$127,601.64	$3,484,010.91
Non-TMC Categorical SIUs	84,646.65	5,024.69	25,745.32	58,731.50	0.00	174,148.16
Non-Categorical SIUs	465,170.08	54,112.02	128,726.58	897,465.63	3,594.78	1,549,069.09
Non-SIUs	211,809.89	42,709.84	0.00	624,726.18	0.00	879,245.91
				TOTAL PRETREATMENT PROGRAM EXPENDITURES:		$6,086,474.07

'MAAE' denotes Minimal Acceptable Activity Expenditures

'EAE' denotes Extraordinary Activity Expenditures

'MASE' denotes Minimal Acceptable Sampling Expenditures

'ESE' denotes Extraordinary Sampling Expenditures

'ELE' denotes Extraordinary Legal Expenditure

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 16

PROGRAM 4662 - SEWAGE AND WASTE CONTROL
DEPARTMENTAL EXPENDITURES FOR 1998

Dept	Division	Section	Section Number	1998 Expenditures
R & D	Environmental Monitoring & Research	Administrative	121	$46,619.54
R & D	Environmental Monitoring & Research	Wastewater Treatment Research	122	22,436.70
R & D	Environmental Monitoring & Research	Land Reclamation and Soil Science-Stickney	123	1,110.12
R & D	Environmental Monitoring & Research	Biology-Stickney	124	3,123.93
R & D	Environmental Monitoring & Research	Toxic Substances	127	125,495.60
R & D	Analytical Laboratories	Administrative	161	76,866.58
R & D	Analytical Laboratories	Stickney Analytical Laboratory	162	183,626.08
R & D	Analytical Laboratories	Industrial Waste Analytical Laboratory	164	473,185.60
R & D	Analytical Laboratories	Egan Analytical Laboratory	166	782.85
R & D	Analytical Laboratories	Calumet Analytical Laboratory	167	38,888.43
R & D	Industrial Waste	Administrative	191	199,481.22
R & D	Industrial Waste	Enforcement	192	1,733,090.80
R & D	Industrial Waste	Field Surveillance-Stickney	194	1,449,299.90
R & D	Industrial Waste	Field Surveillance-Calumet	195	416,956.75
R & D	Industrial Waste	Field Surveillance-North Side	196	550,909.13

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 16

PROGRAM 4662 - SEWAGE AND WASTE CONTROL
DEPARTMENTAL EXPENDITURES FOR 1998
(continued)

Dept	Division	Section	Section Number	1998 Expenditures
R & D	Industrial Waste	Field Surveillance-Kirie	197	633,404.42
Law	Executive	Executive Office	311	32,741.55
Law	Executive	Clerical Section	312	112.14
Law	General Litigation	Litigation	332	375.93
Law	Appeals, Claims & Environmental	Administrative	361	56,322.66
Law	Appeals, Claims & Environmental	Industrial Waste	362	41,644.14

1998 TOTAL EXPENDITURES UNDER PROGRAM 4662: $6,086,474.07

TOTAL EXPENDITURES UNDER PROGRAM 4662

1993	1994	1995	1996	1997	1998
$7,061,571.91	$7,018,700.60	$6,282,000.92	$6,708,839.83	$6,246,708.54	$6,086,474.07

Percentage decrease in expenditures since inception of EME Cost Recovery Program: 13.81%

Identification of TMC Categorical SIUs

As previously stated, EME Charges apply only to those companies that are classified by the District as Significant Industrial Users (SIUs) subject to categorical pretreatment standards for one or more of the following metals of concern: cadmium, chromium, copper, lead, nickel, and zinc. By definition, this group of industrial users is known as "TMC Categorical SIUs." A listing of industrial categories regulated under categorical pretreatment standards for one or more of these metals is provided in Table 9.

For a given year, TMC Categorical SIUs are identified by the most recent and complete annual records available to the District. In other words, companies subject to EME Charges for 2000 are initially based on the District's December 31, 1998, locked-down listing of TMC Categorical SIUs. This preliminary listing is then evaluated for currentness and companies may be removed for any of the following reasons.

1. The company is no longer in business.

2. The company has moved outside the District's jurisdiction.

3. The company no longer performs TMC regulated processes.

4. The company performs TMC regulated processes but no longer discharges a process waste (dry operation).

5. The company has been sold to a new business entity (if the new company continues to perform TMC Categorical processes, they assume the TMC liability of the previous operation).

Based on a November 5, 1999, final lock-down date, 304 TMC Categorical SIUs are subject to EME Charges for 2000.

TMC Loading Determination

Once again, EME Charges are based on the most recent and complete annual records available to the District. EME Charges for 2000 are based on 1998 User Charge verified flow and 1998 average metals concentrations derived from District 22-hour to 26-hour composite sampling data.

TMC loadings are determined only for federally regulated process wastestreams and limited to those metals for which categorical pretreatment standards has been established. As an example, the TMC for a company federally regulated under 40 CFR

425 (Leather Tanning and Finishing) is limited to that facility's regulated chromium discharge loading. For companies federally regulated under 40 CFR 433 (Metal Finishing) the TMC loading is the summation of all six metals of concern (cadmium, copper, chromium, nickel, lead, and zinc).

If either User Charge verified flow or District composite sampling data is unavailable, the best alternative data is used. This may include company self-reported data. All such deviations from standard protocols are noted at the end of Table 17, as found in the section entitled "Extraordinary Monitoring and Enforcement Charge Listing."

EME Charge Determination

Having calculated the metals loadings for each TMC Categorical User, individual EME Charges are computed as follows:

1. Rank TMC Categorical SIUs by decreasing TMC loading.
2. Divide listing into eight equal tiers.
3. Set Tier 8 (bottom Tier) charge equal to $1,000.00.
4. Subtract Tier 8 total charges from total EME Costs. The remainder provides the amount to be recovered from Tiers 1 through 7.
5. Divide amount to be recovered from Tiers 1 through 7 by the number of users in Tiers 1 through 7. This provides the average payment per user.
6. Set Tier 4 equal to the average payment.
7. Set Tier 1 equal to 175% of the average payment.
8. Set Tier 2 equal to 150% of the average payment.
9. Set Tier 3 equal to 125% of the average payment.
10. Set Tier 5 equal to 75% of the average payment.
11. Set Tier 6 equal to 50% of the average payment.
12. Set Tier 7 equal to 25% of the average payment.

For 2000 there are 304 TMC Categorical Users subject to EME Charges. This results in 38 Industrial Users per tier. Individual and total EME charges per tier are as follows:

Tier	EME Charge per User	Number of Users/Tier	Total
1	$13,517.59	38	$513,668.42
2	11,586.50	38	440,287.00
3	9,655.42	38	366,905.96
4	7,724.33	38	293,524.54
5	5,793.25	38	220,143.50
6	3,862.16	38	146,762.08
7	1,931.08	38	73,381.04
8	1,000.00	38	38,000.00
	TOTAL:	304	$2,092,672.54

Details concerning each company's TMC loading and EME liability may be found in Table 17.

EXTRAORDINARY MONITORING AND ENFORCEMENT
COST AND CHARGES for 2000

PREPARATION AND REVIEW DECLARATIONS

The Extraordinary Monitoring and Enforcement Cost and Charges for 2000, as described on pages 22 through 54 of this report, were prepared by:

Timothy F. Moscinski Date: 1/20/00
Timothy F. Moscinski
Pollution Control Officer III

The Extraordinary Monitoring and Enforcement Cost and Charges for 2000, as described on pages 22 through 54 of this report, have been reviewed for content and accuracy and were prepared under the direction of:

Richard C. Sustich Date: 1/20/00
Richard C. Sustich
Assistant Director
Research and Development
Industrial Waste Division

Louis Kollias Date: 1-31-00
Louis Kollias
Assistant Director
Research and Development
Administration Division

EXTRAORDINARY MONITORING AND ENFORCEMENT
CHARGE LISTING

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 17

2000 EIGHT-TIER EXTRAORDINARY MONITORING AND ENFORCEMENT CHARGES
BASED ON 1998 TMC LOADINGS

	A	B	F	AS	AT	AU	AV	AW	AX	AY	AZ	BA	BB	BC	BD
1	USER-NO	COMPANY	CAT1	OUTLET(S)	TOTAL (SAMPLES)	TOTAL TMC FLOW (GPY)	CD (LBS/YR)	CR (LBS/YR)	CU (LBS/YR)	NI (LBS/YR)	PB (LBS/YR)	ZN (LBS/YR)	TMC (LBS/YR)	TIER	EME CHARGE FOR 2000
2	25514	A B DICK CO	433	1A	4	32,702,560	0.27	9.55	30.00	46.37	10.91	43.37	**140.46**	2	**$11,586.50**
3	12990	A M I INC	433	2A	12	799,000	0.01	0.47	0.51	0.03	0.00	1.08	**2.10**	7	**$1,931.08**
4	11379	A P I INDUSTRIES INC	433	1A	191	54,948,659	0.46	63.70	57.28	17.57	0.46	203.93	**343.70**	1	**$13,517.59**
5	11375	A T A FINISHING CORP	413	1A	4	6,088,720	0.00	14.17	6.09	9.65	0.00	2.84	**32.75**	4	**$7,724.33**
6	21743	ABLE CASTING INC	433	2A	5	5,826,920	0.10	0.63	11.37	1.46	0.00	20.22	**33.77**	4	**$7,724.33**
7	24781	ABLE ELECTROPOLISHING CO	433	1A	13	14,773,000	0.12	211.92	2.09	8.99	0.62	1.85	**225.59**	2	**$11,586.50**
8	25290	ABOVE & BEYOND BLACK OXIDE INC	433	1A	4	804,384	0.00	0.13	0.23	0.12	0.20	0.81	**1.49**	7	**$1,931.08**
9	13583	ACCENT METAL FINISHING CO	413	1A	8	1,362,000	0.00				0.26		**0.26**	8	**$1,000.00**
10	11340	ACCURATE ANODIZING	413	1A	14	5,460,400	0.18	48.18	35.20	52.23	3.42	24.41	**163.62**	2	**$11,586.50**
11	11166	ACE ANODIZING & IMPREGNATING INC	413	1A	4	9,708,000	0.00	41.13	4.13	2.27	1.54	4.45	**53.52**	4	**$7,724.33**
12	12145	ACE PLATING	413	1A	4	39,420	0.01	0.00	0.23	0.38	0.00	0.10	**0.73**	7	**$1,931.08**
13	11901	ACME FINISHING CO	413	1A	7	4,149,000	0.07	0.59	2.21	0.93	0.48	25.92	**30.21**	4	**$7,724.33**
14	12254	ACME STEEL - CHICAGO FURNACE PLANT	420	1A	7	482,007,325					249.24	1,230.10	**1,479.34**	1	**$13,517.59**
15	12253	ACME STEEL - RIVERDALE PLANT	420	11A	7	284,781,520					0.00	406.14	**406.14**	1	**$13,517.59**
16	11644	ACTION PLATING CO	413	1A	4	24,684	0.00	0.00	0.02	0.01	0.00	0.05	**0.08**	8	**$1,000.00**
17	11047	ADVANCE ENAMELING CO	413	1C	1	434	0.00				0.00		**0.00**	8	**$1,000.00**
18	12320	AKZO NOBEL CHEMICALS, INC	414	1A	12	167,706,000					8.39	195.81	**204.21**	2	**$11,586.50**
19	13505	AL BAR - WILMETTE PLATERS	413	1A	4	893,860	0.00				0.00		**0.00**	8	**$1,000.00**
20	11427	ALAMO GROUP (IL) INC	433	1C	3	352	0.00	0.00	0.00	0.00	0.00	0.01	**0.01**	8	**$1,000.00**
21	12749	ALANSON MFG CO	433	1A	135	904,930	1.68	3.15	0.42	0.09	0.02	9.41	**14.76**	5	**$5,793.25**
22	12371	ALL BRITE ANODIZING CO	413	1A	27	650,780	0.04				1.45		**1.49**	7	**$1,931.08**
23	25378	ALLIED TUBE & CONDUIT	420	1A	4	21,371,710					0.00	27.09	**27.09**	5	**$5,793.25**
24	11535	ALLIED TUBE & CONDUIT CORP	420	1A	46	222,974,312					5.58	1,231.06	**1,236.64**	1	**$13,517.59**
25	13950	ALLOY CHROME INC	413	1A	7	200,000	0.00				0.02		**0.02**	8	**$1,000.00**
26	11625	ALUMINUM COIL ANODIZING	413	1A	4	102,900,000	0.00	0.00	19.74	427.38	0.00	14.59	**461.70**	1	**$13,517.59**
27	12006	AMBER PLATING WORKS, INC	413	1A	179	119,769,760	25.97	2,011.74	1,073.80	1,716.08	4.00	2,483.22	**7,314.80**	1	**$13,517.59**
28	25314	AMCO CORP DIV OF LEGGETT & PLATT	433	2A	4	7,141,030	0.06	1.67	2.38	0.60	0.00	34.07	**38.77**	4	**$7,724.33**
29	15939	AMCO ENGINEERING CO	433	1A	9	826,000	0.03	0.06	1.81	0.06	0.00	2.65	**4.60**	6	**$3,862.16**
30	13351	AMERICAN NAMEPLATE CO	433	1A	15	2,311,320	0.04	3.37	8.81	2.18	0.29	12.41	**27.10**	5	**$5,793.25**
31	11136	AMERICAN NATIONAL CAN CO	465	1A	4	100,686,779		0.00	23.51			6.72	**30.23**	4	**$7,724.33**
32	13207	AMERICAN NICKEL WORKS	413	2A	250	3,006,960	0.05	25.53	3.89	16.68	0.60	3.74	**50.48**	4	**$7,724.33**
33	25577	AMERICAN PLATING & MFG. (@ 2241 S Indiana)	433	1A	7	3,189,420	0.13	0.05	24.26	28.17	0.00	12.37	**64.98**	3	**$9,655.42**
34	11364	AMERICAN PRECISION CASTINGS	433	3A	11	1,114,520	0.04	0.03	0.47	0.08	0.00	3.49	**4.12**	6	**$3,862.16**
35	11172	AMERICAN RIVET CO	433	2A	4	6,703,900	0.39	5.37	2.18	0.28	1.29	27.45	**36.96**	4	**$7,724.33**
36	24468	AMERICAN STANDARD CIRCUITS INC	433	1A	4	12,667,380	0.11	0.00	123.50	8.24	10.04	9.51	**151.39**	2	**$11,586.50**
37	15689	AMITRON CORP	433	1A	196	53,929,600	0.45	8.10	679.16	13.04	35.98	33.73	**770.46**	1	**$13,517.59**
38	25379	AMPEL INC.	433	1A	85	1,790,000	0.03	0.39	5.81	0.19	1.54	0.90	**8.85**	6	**$3,862.16**
39	13090	ANCHOR METAL FINISHING CO	433	2A	7	3,315,000	0.00	0.14	1.47	0.19	0.30	9.12	**11.22**	6	**$3,862.16**
40	10988	ANDREW CORP	433	1A	4	52,785,250	0.00	0.00	108.74	3.96	18.05	83.20	**213.95**	2	**$11,586.50**
41	24886	ANDREW CORP	433	1A	4	6,195,900	0.00	0.26	43.97	0.52	8.01	32.66	**85.42**	3	**$9,655.42**
42	13103	ANODIZING SPECIALISTS LTD	413	1A	3	1,280,500	0.03				0.53		**0.57**	7	**$1,931.08**
43	12940	AQUARIUS METAL PRODUCTS CO	413	1A	8	550,080	0.02				0.37		**0.39**	7	**$1,931.08**
44	12920	ARLINGTON PLATING CO	413	A1A	7	28,502,689	8.32	49.44	62.52	167.35	3.80	55.62	**347.06**	1	**$13,517.59**
45	10283	ARMSTRONG TOOLS, INC	433	5A	8	613,770	0.00	0.18	1.00	4.01	0.00	1.84	**7.04**	6	**$3,862.16**
46	13513	ASHLAND CHEMICAL INC	414	1A	14	20,254,400					0.00	65.03	**65.03**	3	**$9,655.42**
47	12238	AUTOMATIC ANODIZING	413	3A	187	5,437,960	0.14	144.13	32.47	8.48	9.25	9.12	**203.59**	2	**$11,586.50**
48	12961	AVIS COMMERCIAL ANODIZING	413	1A	98	463,760	0.01	0.13	0.57	0.21	0.07	0.74	**1.73**	7	**$1,931.08**
49	12831	B & T POLISHING INC	433	1A	4	5,078,920	0.04	2.29	11.18	18.30	0.00	18.93	**50.75**	4	**$7,724.33**
50	12823	BARNES PLATING CORP	413	1A	178	946,180	0.01				0.01		**0.02**	8	**$1,000.00**
51	13254	BELLWOOD INDUSTRIAL INC	413	2A	4	2,924,680	0.05				0.00		**0.05**	8	**$1,000.00**
52	11138	BELMONT PLATING WORKS, INC	413	1A1	193	60,062,306	248.96	730.34	271.00	773.42	1.00	674.74	**2,699.46**	1	**$13,517.59**
53	10958	BERTEAU-LOWELL PLATING WORKS, INC	413	1A	4	40,863,240	15.00	71.23	40.90	78.36	0.00	160.86	**366.36**	1	**$13,517.59**
54	13048	BLACKSTONE MFG CO	433	4A	4	27,960,240	0.00	6.53	8.63	0.47	0.00	48.50	**64.13**	3	**$9,655.42**
55	11203	BLOCK & COMPANY INC	433	1A	4	2,086,238	0.03	0.05	0.63	0.09	0.00	0.59	**1.39**	7	**$1,931.08**
56	11892	BOBCO ENTERPRISES INC	413	1A	360	4,951,760	0.12	0.37	5.16	2.52	0.04	3.06	**11.27**	6	**$3,862.16**
57	15980	BODINE ELECTRIC CO	433	1A	4	19,683,375	0.16	2.30	67.63	3.45	0.00	86.02	**159.56**	2	**$11,586.50**
58	25009	BOEING PRECISION GEAR INC	433	1A	14	10,303,000	0.17	0.95	5.24	0.43	0.00	15.30	**22.08**	5	**$5,793.25**

TABLE 17

2000 EIGHT-TIER EXTRAORDINARY MONITORING AND ENFORCEMENT CHARGES
BASED ON 1998 TMC LOADINGS

	A	B	F	AS	AT	AU	AV	AW	AX	AY	AZ	BA	BB	BC	BD
1	USER-NO	COMPANY	CAT1	OUTLET(S)	TOTAL (SAMPLES)	TOTAL TMC FLOW (GPY)	CD (LBS/YR)	CR (LBS/YR)	CU (LBS/YR)	NI (LBS/YR)	PB (LBS/YR)	ZN (LBS/YR)	TMC (LBS/YR)	TIER	EME CHARGE FOR 2000
59	10311	BORG WARNER AUTOMOTIVE INC	433	1A	4	23,608,296	0.39	3.54	5.51	3.74	0.00	9.65	22.84	5	$5,793.25
60	10312	BOYE NEEDLE CO	433	1A	8	1,525,342	0.00	0.01	0.98	12.23	0.18	2.35	15.75	5	$5,793.25
61	11898	BRETFORD MFG INC	433	1A	10	3,457,256	0.06	0.75	2.80	0.69	0.69	13.18	18.17	5	$5,793.25
62	11260	BRETFORD MFG INC	433	1A	4	12,146,240	0.00	0.00	1.72	0.30	0.00	1.42	3.44	7	$1,931.08
63	10314	BREUER ELECTRIC MFG CO	433	2A	4	967,920	0.00	0.02	0.37	0.09	0.00	1.35	1.82	7	$1,931.08
64	11186	BRIGHT METALS FINISHING CO	413	1A	4	4,951,760	0.04	7.35	9.50	7.14	0.99	4.09	29.11	5	$5,793.25
65	25265	BRIJEN ELECTRONICS	433	1A	187	548,000	0.01	0.03	3.54	0.06	0.03	0.30	3.96	6	$3,862.16
66	15695	BRISKIN MFG CO	433	1A	10	7,519,300	0.06	0.56	3.57	0.56	73.62	133.70	212.09	2	$11,586.50
67	10870	BRISKIN MFG. CO.	433	1A	6	7,119,300	0.06	0.95	5.52	1.01	12.88	37.17	57.59	3	$9,655.42
68	25289	C M P ANODIZING	433	1A	8	2,513,300	0.04	8.03	4.21	1.13	0.19	2.85	16.45	5	$5,793.25
69	13195	C P SYSTEMS	413	1A	10	14,792,400	0.12	0.62	7.28	5.06	0.99	28.13	42.19	4	$7,724.33
70	11807	CALCO PLATING	413	3A	12	4,181,320	0.00				0.00		0.00	8	$1,000.00
71	11576	CASTLE METAL FINISHING CORP	413	1A	11	16,101,000	8.19	44.98	22.83	14.23	0.00	167.58	257.82	2	$11,586.50
72	21828	CENTRAL STEEL FABRICATORS INC	433	1A	8	1,074,882	0.01	0.00	1.04	0.17	0.00	1.76	2.98	7	$1,931.08
73	11548	CENTURY PLATING CO	413	1A,2A	7	20,495,200	1.24	135.63	17.08	108.42	0.00	18.01	280.38	2	$11,586.50
74	12925	CHEM-PLATE INDUSTRIES	413	1A1	4	20,052,000	0.00	62.38	22.24	2.68	0.00	134.29	221.58	2	$11,586.50
75	11256	CHICAGO ALLIS MFG	433	1A	4	24,152,920	0.00	1.01	6.45	10.88	3.22	65.47	87.02	3	$9,655.42
76	11084	CHICAGO ANODIZING CO	413	2A	308	16,149,320	0.13	49.29	9.43	21.68	0.40	10.51	91.45	3	$9,655.42
77	10341	CHICAGO EXTRUDED METALS	468	4C	4	357,295		0.02	0.60	0.03	0.18	5.49	6.32	6	$3,862.16
78	10342	CHICAGO FAUCET CO	433	1A	193	23,365,029	0.19	212.01	134.26	336.73	1.95	86.32	771.47	1	$13,517.59
79	13330	CHICAGO FINISHED METALS	465	1A	4	5,744,980		0.43	1.77			24.63	26.83	5	$5,793.25
80	10347	CHICAGO HARDWARE & FIXTURE	433	1A	4	2,795,076	0.00	0.26	0.91	0.28	0.00	7.39	8.83	6	$3,862.16
81	12808	CHICAGO NAME PLATE CO	433	1A	4	3,997,900	0.00	3.63	6.07	2.20	0.00	4.30	16.20	5	$5,793.25
82	13354	CHILO MFG & PLATING CO INC	433	1A	91	3,575,440	0.36	0.12	36.35	33.13	0.00	21.65	91.60	3	$9,655.42
83	12711	CHRIS INDUSTRIES INC	433	1A	4	364,000	0.00	0.03	0.13	0.02	0.00	0.14	0.32	8	$1,000.00
84	14522	CIRCUIT ETCHING TECHNICS INC	433	1A	194	3,119,000	0.03	0.21	109.85	0.23	1.56	1.90	113.78	3	$9,655.42
85	12128	CIRCUIT SYSTEMS, INC.-PLANT 1	433	1A	8	48,776,000	0.00	1.22	235.53	30.51	6.51	160.68	434.45	1	$13,517.59
86	14472	CIRCUIT SYSTEMS, INC.-PLANT 2	433	1A	8	74,289,700	0.62	1.24	166.05	70.63	0.00	71.87	310.41	2	$11,586.50
87	10279	CLAD-REX INC	433	2A	4	3,071,288	0.10	0.31	1.02	0.44	0.00	5.74	7.61	6	$3,862.16
88	12340	CODY METAL FINISHING INC	413	3A	187	3,777,400	0.16	19.44	10.05	0.85	0.03	116.15	146.68	2	$11,586.50
89	15230	COMMERCIAL FINISHES CO INC	433	1A	4	993,400	0.02	0.03	0.22	0.17	0.00	0.93	1.38	7	$1,931.08
90	16977	COOPER FREDERICK LAMPS INC	433	2A	4	7,113,480	0.00	0.47	68.05	0.53	0.00	19.87	88.93	3	$9,655.42
91	25559	COOPER LIGHTING (formerly FAIL SAFE LIGHTING)	433	1A	11	6,346,643	0.00	0.11	1.59	0.85	0.00	3.71	6.25	6	$3,862.16
92	10814	CRAFTSMAN PLATING & TINNING	413	1A	4	28,151,968	101.19	128.66	306.87	63.39	21.60	233.85	855.57	1	$13,517.59
93	11603	CRESCENT PLATING WORKS, INC	413	5A	220	20,719,600	0.69	257.82	31.28	135.99	0.17	89.86	515.81	1	$13,517.59
94	12996	CRO-MAT CO	413	2A	4	121,125	0.00				0.00		0.00	8	$1,000.00
95	14380	CYPRUS ROD	468	21A	4	40,700		0.00	0.07	0.00	0.00	0.02	0.09	8	$1,000.00
96	13702	DASSINGER HARD CHROME	413	1A	7	683,200	0.00				0.23		0.23	8	$1,000.00
97	10397	DAUBERT CHEMICAL CO INC	433	1C	4	1,346,400	0.00	0.03	0.90	12.91	0.00	4.47	18.31	5	$5,793.25
98	24089	DEHLER MFG CO INC	433	1A	4	2,980,145	0.02	6.71	0.82	0.00	0.00	2.63	10.19	6	$3,862.16
99	10844	DEMUTH STEEL PRODUCTS CO	433	1A	7	367,000	0.00	0.05	0.18	0.04	0.00	0.40	0.67	7	$1,931.08
100	12929	DOVER INDUSTRIAL CHROME	413	1C	7	29,900	0.00				0.03		0.03	8	$1,000.00
101	14650	DOWNEY B L CO INC	433	1A	19	7,672,236	0.00	0.51	3.71	53.43	0.19	87.92	145.76	2	$11,586.50
102	12058	DYNA BURR CHICAGO INC	413	1A	4	2,340,000	1.25				0.00		1.25	7	$1,931.08
103	11852	DYNACIRCUITS MFG CO	413	1A	4	35,068,241	0.29	1.17	52.35	4.68	0.00	26.03	84.52	3	$9,655.42
104	13627	EAGLE ELECTRONICS	433	1A	9	17,941,000	0.00	0.45	30.22	4.49	4.19	6.28	45.64	4	$7,724.33
105	25437	EASCO ALUMINUM, INC (formerly Dalton Aluminum)	467	1A	5	62,794,600		0.00				43.47	43.47	4	$7,724.33
106	24378	EDSAL MANUFACTURING CO	433	1A	4	12,686,080	0.00	0.00	2.22	0.00	0.00	5.08	7.30	6	$3,862.16
107	11406	EDSAL MFG CO	433	1A	8	11,400,268	0.10	0.10	3.42	0.95	1.52	7.51	13.60	5	$5,793.25
108	23655	ELECTRO-CIRCUITS INC	433	1A	7	8,076,000	0.13	0.13	88.23	4.58	0.98	5.52	98.48	3	$9,655.42
109	24756	ELECTRONIC INTERCONNECT CORP	433	1A	195	15,310,000	0.13	1.28	157.05	1.53	3.19	6.77	169.95	2	$11,586.50
110	12222	ELECTRONIC PLATING CO	433	3A	191	21,884,236	4.02	44.17	27.38	49.28	0.00	159.52	284.36	2	$11,586.50
111	12469	ELK GROVE PLATING	413	1A	168	15,187,850	0.13	155.04	12.92	4.18	0.25	326.67	499.19	1	$13,517.59
112	11977	EMPIRE HARD CHROME	413	1A	182	25,312,320	0.21	451.55	10.98	3.38	0.84	10.13	477.10	1	$13,517.59
113	10427	ENAMELED STEEL & SIGN CO	413	1A	10	9,200	0.00				0.00		0.00	8	$1,000.00
114	11495	ENAMELERS & JAPANNERS INC - ELSTON	433	2A	4	2,241,234	0.00	0.00	0.43	0.11	0.00	4.00	4.54	6	$3,862.16
115	15546	EN-CHRO PLATING INC	433	1C	4	312,000	0.08	0.09	0.07	0.76	0.07	0.18	1.24	7	$1,931.08

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 17

2000 EIGHT-TIER EXTRAORDINARY MONITORING AND ENFORCEMENT CHARGES
BASED ON 1998 TMC LOADINGS

	A	B	F	AS	AT	AU	AV	AW	AX	AY	AZ	BA	BB	BC	BD
1	USER-NO	COMPANY	CAT1	OUTLET(S)	TOTAL (SAMPLES)	TOTAL TMC FLOW (GPY)	CD (LBS/YR)	CR (LBS/YR)	CU (LBS/YR)	NI (LBS/YR)	PB (LBS/YR)	ZN (LBS/YR)	TMC (LBS/YR)	TIER	EME CHARGE FOR 2000
116	14287	ENGIS CORP	433	1A	5	2,156,000	0.00	0.00	1.40	12.28	0.00	2.12	15.81	5	$5,793.25
117	25323	ETCH-A-DIE	433	1A	4	1,491,999	0.00	1.32	0.45	0.05	0.00	0.98	2.80	7	$1,931.08
118	25365	EX-CELL METAL PRODUCTS	433	1A	6	1,505,000	0.00	0.00	0.00	0.00	0.00	0.58	0.58	7	$1,931.08
119	11212	FILMCOTE INC	433	1A	4	1,977,540	0.00	1.04	0.66	5.51	0.00	0.41	7.62	6	$3,862.16
120	24826	FINISHING CO, INC, THE	433	2A	4	3,519,570	0.06	0.09	1.70	0.41	0.00	4.40	6.66	6	$3,862.16
121	11855	FINISHING CO, THE	413	2A	198	7,070,096	0.18	1,381.30	146.82	157.32	1.24	40.69	1,727.54	1	$13,517.59
122	25367	FLUID MANAGEMENT	433	1A	1	2,800	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8	$1,000.00
123	25554	FOCAL POINT LLC(@ 12500 Lombard Ln., Alsip)	433	1A	1	1,651,400	0.00	1.32	2.34	1.65	0.00	22.99	28.30	5	$5,793.25
124	13389	FORD MOTOR CO - CHICAGO ASSEMBLY PLANT	433	3A	183	75,176,800	1.25	6.27	17.56	183.08	77.12	565.53	850.80	1	$13,517.59
125	11905	FOREST PLATING CO	413	2A	4	1,704,692	0.00				1.88		1.88	7	$1,931.08
126	11350	FORMWELL CORP	433	1A	43	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8	$1,000.00
127	13338	FOTO FABRICATION CORP	433	1A	4	3,560,480	0.00	0.83	26.19	6.15	0.45	14.13	47.75	4	$7,724.33
128	10439	FRAMBURG AND CO	433	1A	146	3,797,000	0.03	0.16	32.62	25.65	0.03	10.83	69.32	3	$9,655.42
129	12719	GATTO INDUSTRIAL PLATING	433	1A	14	26,696,120	0.22	8.68	59.67	10.69	0.00	119.12	198.38	2	$11,586.50
130	11990	GEM COAT INC	413	1A	4	2,191,640	3.93				0.29		4.22	6	$3,862.16
131	25242	GENERAL CIRCUIT D/B/A DELTA PRECISION	433	1A	188	6,216,676	0.05	0.21	72.43	0.31	0.52	3.84	77.36	3	$9,655.42
132	13401	GENERAL FIRE EXTINGUISHER CO	433	1A	4	5,082,926	0.04	0.93	4.24	2.59	0.00	4.92	12.72	5	$5,793.25
133	13393	GENERAL MOTORS - ELECTRO MOTIVE	433	1A	14	86,473,000	0.00	0.72	25.24	3.61	0.00	81.49	111.06	3	$9,655.42
134	11641	GENERAL TUBE CORPORATION	420	1A	8	1,353,540					0.00	2.27	2.27	7	$1,931.08
135	12197	GEO-RAE CORP	433	1A	13	6,000	0.00	0.00	0.00	0.00	0.00	0.02	0.02	8	$1,000.00
136	11632	GRAPH-ON INC	433	1A	4	92,400	0.01	0.02	0.09	0.02	0.01	0.16	0.31	8	$1,000.00
137	23696	GREENLEE DIAMOND TOOL CO	433	1C	10	120,000	0.00	0.01	0.11	0.83	0.00	0.07	1.01	7	$1,931.08
138	11724	GRIFFIN PLATING CO	413	1A	8	1,174,360	0.01				0.33		0.34	7	$1,931.08
139	11837	GUTMANN LEATHER CO, INC	425	2A	213	64,939,100		7,767.51					7,767.51	1	$13,517.59
140	10204	HALL CO THE C P	414	1A	7	17,675,500					0.00	11.06	11.06	6	$3,862.16
141	10471	HANDY BUTTON MACHINE CO	433	1A	7	2,278,934	0.11	14.75	8.80	4.28	0.00	41.66	69.60	3	$9,655.42
142	12184	HAUSNER HARD-CHROME INC	413	1A	5	5,438,200	0.09	15.96	2.45	0.14	0.00	1.86	20.50	5	$5,793.25
143	11903	HAYDOCK CASTER CO	433	1A	28	6,581,000	0.05	0.55	12.40	0.38	0.33	28.98	42.70	4	$7,724.33
144	11861	HEICO OHMITE LLC (formerly Ohmite Mfg Co)	433	1A	4	19,396,080	3.56	0.00	13.26	0.49	0.00	30.74	48.04	4	$7,724.33
145	13308	HI-TEMP INC	413	1A,2A	8	5,471,600	0.04	1.86	5.71	3.80	0.00	25.65	37.06	4	$7,724.33
146	24944	HOMAK MANUFACTURING CO	433	1A	13	9,563,300	0.00	0.32	4.31	0.88	0.40	16.35	22.25	5	$5,793.25
147	10487	HORWEEN LEATHER CO	425	1A	53	93,066,160		2,096.44					2,096.44	1	$13,517.59
148	11474	HU-FRIEDY MFG CO INC	433	1A	4	7,253,750	0.06	29.64	11.80	11.68	0.97	5.87	60.01	3	$9,655.42
149	25176	IDEAL CIRCUITS INC	433	1A	261	470,800	0.00	0.03	7.24	0.19	0.05	1.02	8.54	6	$3,862.16
150	10501	ILLINOIS TOOL WORKS - CHRONOMATIC	413	2A	4	2,360,120	0.02				0.00		0.02	8	$1,000.00
151	13717	IMPERIAL PLATING CO INC	433	1A	186	10,973,160	0.09	83.28	69.00	84.84	0.00	95.82	333.03	1	$13,517.59
152	15918	INTER CONNECT SYSTEMS INC	433	1A	3	553,520	0.00	0.01	6.62	0.08	0.00	0.43	7.14	6	$3,862.16
153	12402	INTERNATIONAL PROCESSING CO OF AMERICA	413	1A	4	1,793,000	0.01	10.42	0.82	0.00	0.00	0.66	11.92	6	$3,862.16
154	12718	INTERNATIONAL SILVER PLATING	413	1A	21	78,000	0.00				0.00		0.00	8	$1,000.00
155	10678	ITW SIGNODE	433	1A	3	18,133,000	0.00	0.91	27.83	2.27	3.02	83.18	117.20	3	$9,655.42
156	25525	J G METAL FINISHING	433	2A	8	209,440	0.00	0.23	2.92	2.59	0.03	2.48	8.26	6	$3,862.16
157	12424	J L O METAL PRODUCTS CO	433	2A	4	11,100,320	0.28	4.54	5.74	2.13	0.00	57.21	69.90	3	$9,655.42
158	13267	JACOB ANODIZING	413	1A	4	1,877,480	0.11	22.91	26.74	3.27	3.10	17.87	74.00	3	$9,655.42
159	11062	JAMES PRECIOUS METALS PLATING	433	1A	112	2,116,840	0.04	0.11	29.54	2.74	0.19	1.89	34.50	4	$7,724.33
160	11396	JENSEN PLATING WORKS INC	413	2A	4	2,720,125	0.02	52.68	6.49	7.46	0.00	8.62	75.27	3	$9,655.42
161	11397	JENSEN PLATING WORKS INC	413	2A	4	2,549,000	0.04	1.25	4.17	39.20	0.00	8.23	52.89	4	$7,724.33
162	13724	JONAS ENTERPRISES INC	413	1C	2	32,500	0.00				0.01		0.01	8	$1,000.00
163	11099	KALMUS & ASSOC INC	413	2A	12	38,011,116	0.63	1.59	202.25	234.91	2.85	15.53	457.77	1	$13,517.59
164	24910	KILOBAR COMPACTING CORP	471	2A	2	15,000			0.00		0.00		0.00	8	$1,000.00
165	11653	KLEIN TOOLS INC	433	4A	14	42,596,356	0.36	40.14	9.59	3.20	0.00	254.72	308.00	2	$11,586.50
166	24431	KNOWLES ELECTRONICS IC GROUP	433	1A	4	7,309,200	0.00	0.79	2.26	0.43	0.00	7.92	11.40	6	$3,862.16
167	15505	KOMET OF AMERICA INC	433	1A	4	2,218,000	0.00	2.92	0.98	0.81	0.00	2.66	7.38	6	$3,862.16
168	10157	KOPPERS INDUSTRIES INC	414	1A	36	139,791,400					0.00	198.20	198.20	2	$11,586.50
169	11882	KREL LABORATORIES INC	413	2A	10	7,427,640	0.81	1.24	64.73	74.65	0.00	17.84	159.26	2	$11,586.50
170	11883	KREL LABORATORIES INC	413	3A	10	7,106,000	0.24	1.19	1.48	44.74	0.00	3.73	51.38	4	$7,724.33
171	10797	LAKE CITY PLATING WORKS	413	1A	4	269,280	0.00				0.00		0.00	8	$1,000.00
172	10885	LAKEWOOD ENGINEERING & MFG	433	1A	4	27,187,217	0.00	1.36	7.71	0.45	0.00	55.55	65.07	3	$9,655.42

TABLE 17

2000 EIGHT-TIER EXTRAORDINARY MONITORING AND ENFORCEMENT CHARGES
BASED ON 1998 TMC LOADINGS

	A	B	F	AS	AT	AU	AV	AW	AX	AY	AZ	BA	BB	BC	BD
1	USER-NO	COMPANY	CAT1	OUTLET(S)	TOTAL (SAMPLES)	TOTAL TMC FLOW (GPY)	CD (LBS/YR)	CR (LBS/YR)	CU (LBS/YR)	NI (LBS/YR)	PB (LBS/YR)	ZN (LBS/YR)	TMC (LBS/YR)	TIER	EME CHARGE FOR 2000
173	11177	LAMINATES & COMPOSITES	465	1A	4	11,837,729		3.26				14.22	**17.47**	5	**$5,793.25**
174	12068	LITTELFUSE INC	433	1A	5	95,280,240	4.77	86.62	185.95	350.44	0.00	526.84	**1,154.61**	1	**$13,517.59**
175	13590	LITTON / KESTER SOLDER	471	1C	3	4,000					0.00		**0.00**	8	**$1,000.00**
176	12475	M P C PRODUCTS CORP	433	1A	8	3,410,880	0.03	2.47	2.22	1.65	0.00	6.40	**12.77**	5	**$5,793.25**
177	13923	MAGNETIC INSPECTION LABORATORY INC	433	1A	9	8,380,300	0.07	19.71	7.06	29.49	0.00	14.26	**70.59**	3	**$9,655.42**
178	13502	MAJOR REFLECTOR PRODUCTS CO	433	2A	4	56,550,000	0.47	18.87	127.34	12.26	8.49	81.59	**249.02**	2	**$11,586.50**
179	11064	MECH-TRONICS	413	2A,3A	16	7,837,544	0.13	14.38	8.82	3.73	1.11	18.37	**46.54**	4	**$7,724.33**
180	25413	MECO METAL FINISHING ILLINOIS LLC	433	2A	4	5,922,165	0.00	5.48	15.76	3.65	0.00	5.73	**30.62**	4	**$7,724.33**
181	13483	MEISEL PLATING CO	413	1A	106	284,240	0.00				0.27		**0.27**	8	**$1,000.00**
182	24682	METAL BOX INTERNATIONAL	433	1A	4	2,137,784	0.37	0.00	1.52	0.91	0.00	1.96	**4.76**	6	**$3,862.16**
183	25253	METAL IMPACT CORP	433	1A	7	5,398,420	0.05	0.23	8.55	0.36	0.00	115.39	**124.58**	3	**$9,655.42**
184	10838	METHODE ELECTRONICS	433	1C	4	18,000	0.00	0.02	0.00	0.03	0.00	0.19	**0.25**	8	**$1,000.00**
185	10766	MIDWAY WIRE INC	420	1A	185	108,033,640		5.41			69.38	436.99	**511.77**	1	**$13,517.59**
186	12951	MIDWEST METAL FINISHING	413	2A	11	1,009,800	0.03				0.34		**0.36**	7	**$1,931.08**
187	13289	MIKE'S ANODIZING	413	2A	4	5,841,880	0.05	3.31	8.28	1.66	0.00	5.80	**19.10**	5	**$5,793.25**
188	24154	MILTON ENTERPRISES	433	1A	8	923,010	0.01	0.06	0.42	0.18	0.00	0.70	**1.38**	7	**$1,931.08**
189	24946	MORSE AUTOMOTIVE CORP	433	1A	2	3,800	0.00	0.00	0.00	0.01	0.00	0.01	**0.03**	8	**$1,000.00**
190	13712	MOTOROLA INC	433	1A	4	51,716,064	0.00	0.00	16.39	0.00	0.00	33.21	**49.60**	4	**$7,724.33**
191	10448	MOTOROLA INC COMMUNICATIONS BLDG	433	2A	7	21,167,840	0.00	1.94	3.35	0.18	0.00	5.65	**11.12**	6	**$3,862.16**
192	10201	MULTIGRAPHICS INC	433	1C	1	4,000	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**	8	**$1,000.00**
193	25052	NACME STEEL PROCESSING LLC	420	1A	4	19,298,400					0.00	23.02	**23.02**	5	**$5,793.25**
194	13268	NATIONAL CASTINGS, INC	464	1C	8	35,000			0.01		0.02	0.37	**0.41**	7	**$1,931.08**
195	14912	NATIONAL COATING TECHNOLOGY	433	1A	8	553,000	0.00	0.06	0.18	0.03	0.15	0.34	**0.76**	7	**$1,931.08**
196	12353	NATIONAL MATERIAL CORP	465	1A	4	3,791,063		0.25				2.91	**3.16**	7	**$1,931.08**
197	24395	NATIONAL TECHNOLOGY INC	433	1A	4	52,499,600	0.44	4.38	418.14	43.78	7.44	22.77	**496.96**	1	**$13,517.59**
198	21811	NEW METAL CRAFTS INC	433	1C,2C	2	19,500	0.00	0.02	0.08	0.00	0.00	0.04	**0.15**	8	**$1,000.00**
199	10987	NINA ENTERPRISES, INC	433	1C	4	117,200	0.00	0.04	0.01	0.01	0.02	0.19	**0.26**	8	**$1,000.00**
200	19614	NOBERT PLATING CO	413	2A	4	15,852,495	0.00	1.06	170.15	149.93	3.04	56.06	**380.24**	1	**$13,517.59**
201	12622	NOBERT PLATING CO	413	1A	4	4,076,600	0.03	1.16	14.48	24.72	4.11	5.44	**49.94**	4	**$7,724.33**
202	25406	NORTH AMERICAN ELECTROLESS	433	1A	5	2,419,200	0.00	0.56	0.65	40.82	0.00	6.46	**48.48**	4	**$7,724.33**
203	13548	NORTHROP CORP - GRUMMAN	433	2A	4	461,388	0.00	0.03	0.14	0.02	0.00	0.19	**0.38**	7	**$1,931.08**
204	13547	NORTHROP GRUMMAN CORP	433	5A	18	23,559,504	0.00	0.20	31.44	6.09	0.00	13.16	**50.89**	4	**$7,724.33**
205	12461	NORTHWESTERN PLATING WORKS	413	2A	26	5,131,280	0.13	47.67	51.87	9.71	0.60	87.82	**197.80**	2	**$11,586.50**
206	24696	NUWAY INDUSTRIES INC	433	1A,2A,3A	12	3,181,244	0.42	2.20	23.93	2.36	0.00	17.96	**46.88**	4	**$7,724.33**
207	13124	OMEGA PLATING INC	433	1A	4	2,457,500	0.00	0.14	6.17	0.33	0.47	2.05	**9.16**	6	**$3,862.16**
208	12979	OMNI-CIRCUITS INC	413	1A	4	28,731,000	0.00	4.55	333.07	2.88	0.00	12.70	**353.19**	1	**$13,517.59**
209	11140	P & H PLATING CO INC	413	1A	324	28,336,590	0.47	46.79	78.22	64.28	1.89	127.14	**318.81**	2	**$11,586.50**
210	10182	P V S CHEMICALS INC (ILLINOIS)	415	1C	3	3,801,600		0.79					**0.79**	7	**$1,931.08**
211	12126	PERFECTION PLATING INC	413	1A	6	10,030,200	0.08	1.84	53.54	29.78	0.92	6.78	**92.94**	3	**$9,655.42**
212	11920	PETERSEN FINISHING CORP	413	2A	4	30,205,000	0.00	5.29	20.40	9.32	0.00	12.34	**47.36**	4	**$7,724.33**
213	13153	PIONEER PLATING CO INC	413	1A	186	10,711,360	0.63	41.90	8.04	5.36	0.18	174.29	**230.39**	2	**$11,586.50**
214	10799	PLATING SERVICE CO	413	1A	182	5,849,360	0.05	19.46	8.54	60.10	0.15	86.69	**174.99**	2	**$11,586.50**
215	25099	PRE FINISH METALS	465	1A	4	25,766,200		253.36				695.17	**948.52**	1	**$13,517.59**
216	11176	PRE FINISH METALS INC	465	1A	4	4,998,000		113.09				91.08	**204.16**	2	**$11,586.50**
217	13721	PRECISE FINISHING CO INC	413	1A	6	6,399,140	0.96	0.75	11.85	12.97	0.00	4.00	**30.53**	4	**$7,724.33**
218	13110	PRECISION FINISHING	413	1A	4	762,960	0.01				0.13		**0.14**	8	**$1,000.00**
219	10635	PRECISION INSTRUMENT	433	1A	8	2,463,912	0.00	0.04	1.85	1.79	0.00	3.10	**6.78**	6	**$3,862.16**
220	12127	PRECISION PLATING CO	413	1A	190	27,317,620	0.23	12.30	127.58	316.00	12.30	21.19	**489.60**	1	**$13,517.59**
221	10995	PRECOAT METALS	465	1A	13	3,430,495		34.56	0.72			7.12	**42.40**	4	**$7,724.33**
222	21463	PRO-TEC METAL FINISHING CORP	433	2A	9	246,840	0.01	0.03	0.16	0.07	0.00	0.78	**1.06**	7	**$1,931.08**
223	25324	PULSAR INC	433	1A	8	66,572	0.00	0.00	0.28	0.01	0.00	0.05	**0.34**	7	**$1,931.08**
224	13277	Q C FINISHERS INC	433	1A	6	1,291,221	0.03	2.04	0.28	0.24	0.00	3.08	**5.66**	6	**$3,862.16**
225	24330	QMA INC	433	1A	188	7,264,000	0.06	0.55	123.47	1.03	0.00	4.97	**130.07**	2	**$11,586.50**
226	10639	QUAM NICHOLS CO	433	1A	4	6,343,040	0.00	0.00	1.96	0.00	0.00	10.05	**12.01**	5	**$5,793.25**
227	15043	R & R RESEARCH D/B/A E J SOMERVILLE	433	2A	8	1,092,828	0.02	15.89	0.35	0.08	0.07	0.68	**17.09**	5	**$5,793.25**
228	13115	R C INDUSTRIES INC	413	1A	4	8,280,360	0.21	1.04	7.18	5.39	0.00	9.74	**23.55**	5	**$5,793.25**
229	11531	R S OWENS & CO	433	1A	4	15,902,680	0.13	0.00	29.71	16.45	0.00	66.45	**112.73**	3	**$9,655.42**

TABLE 17

2000 EIGHT-TIER EXTRAORDINARY MONITORING AND ENFORCEMENT CHARGES
BASED ON 1998 TMC LOADINGS

	A	B	F	AS	AT	AU	AV	AW	AX	AY	AZ	BA	BB	BC	BD
1	USER-NO	COMPANY	CAT1	OUTLET(S)	TOTAL (SAMPLES)	TOTAL TMC FLOW (GPY)	CD (LBS/YR)	CR (LBS/YR)	CU (LBS/YR)	NI (LBS/YR)	PB (LBS/YR)	ZN (LBS/YR)	TMC (LBS/YR)	TIER	EME CHARGE FOR 2000
230	11244	READY METAL MFG CO	433	1A	11	11,270,840	0.00	0.26	5.27	0.94	0.00	13.17	**19.66**	5	**$5,793.25**
231	10645	REFLECTOR HARDWARE CORP	433	2A	184	4,051,800	0.07	0.73	1.67	1.37	0.10	8.94	**12.88**	5	**$5,793.25**
232	13232	REGENCY METAL FINISHING	433	2A	192	3,196,960	0.05	9.98	1.91	1.58	0.21	12.05	**25.78**	5	**$5,793.25**
233	12285	REHBERGER A C CO	433	1A	4	1,211,600	0.02	0.02	4.59	0.36	0.21	2.75	**7.95**	6	**$3,862.16**
234	12599	REINEWALD PLATING	413	6A,11A	16	13,030,160	0.76	2.83	73.35	273.20	0.33	29.78	**380.24**	1	**$13,517.59**
235	11241	RELIABLE PLATING CORP	413	3A	4	21,018,800	21.56	173.72	51.36	64.16	0.00	17.35	**328.16**	1	**$13,517.59**
236	24508	RELIANT BOLT	420	1A	19	23,490,500					0.00	7.25	**7.25**	6	**$3,862.16**
237	25604	REPUBLIC TECHNOLOGIES (formerly Republic Engr Steels)	420	1C,2C	4	73,308,425					0.00	26.90	**26.90**	5	**$5,793.25**
238	24347	RIPPEL ARCHITECTURAL METALS INC	433	2A	4	8,636,054	0.00	0.86	13.83	0.43	32.77	12.96	**60.86**	3	**$9,655.42**
239	11031	RIVERDALE PLATING & HEAT TREATING, INC	413	1A	164	38,365,000	0.96	123.19	8.64	4.48	0.32	909.02	**1,046.60**	1	**$13,517.59**
240	13581	RIXSON-FIREMARK DIV	433	1A	4	1,866,410	0.03	0.12	3.19	0.17	1.40	4.37	**9.29**	6	**$3,862.16**
241	14438	RYERSON COIL PICKLING DIV	420	2A	3	13,227,100					2.43	49.20	**51.63**	4	**$7,724.33**
242	15773	S & B FINISHING CO, INC	433	3A,4A	28	5,086,400	0.13	0.38	7.17	1.06	0.00	18.71	**27.45**	5	**$5,793.25**
243	10670	S & C ELECTRIC CO	433	1A	4	145,936,904	3.65	86.42	214.21	187.44	23.13	300.63	**815.47**	1	**$13,517.59**
244	13141	S & D WIRE CO INC	420	1A	2	564,000					0.00	0.69	**0.69**	7	**$1,931.08**
245	10658	SAFETY SOCKET SCREW CORP	433	1A	121	3,113,760	0.05	0.36	2.00	0.34	0.10	4.49	**7.35**	6	**$3,862.16**
246	11339	SAPORITO C J PLATING CO	413	1A	10	20,674,720	78.80	128.80	52.76	45.87	5.17	191.22	**502.63**	1	**$13,517.59**
247	12272	SATE-LITE MFG CO	433	1C	6	51,480	0.00	0.04	0.01	0.72	0.00	0.15	**0.93**	7	**$1,931.08**
248	12968	SCIENTIFIC PLATING	413	2A	4	28,850,360	0.00	12.03	89.75	34.41	14.20	9.87	**160.25**	2	**$11,586.50**
249	12394	SCOTT PLATING INC	413	1A,2A	187	587,064	0.04	15.02	0.34	3.28	0.01	15.85	**34.54**	4	**$7,724.33**
250	13574	SENIOR FLEXONICS INC	433	3A	4	58,374,275	0.00	6.82	96.39	14.61	0.00	93.47	**211.29**	2	**$11,586.50**
251	10877	SHURE BROTHERS, INC	433	1C	6	249,600	0.01	1.93	0.04	0.06	0.04	1.68	**3.76**	6	**$3,862.16**
252	10679	SIGNODE CORPORATION	465	1A	7	27,452,000		0.00				7.78	**7.78**	6	**$3,862.16**
253	25203	SINTER METALS INC	471	1A	4	3,941,960			5.33		0.00		**5.33**	6	**$3,862.16**
254	11951	SKILD PLATING CORP	413	2A	4	949,960	0.03				0.00		**0.03**	8	**$1,000.00**
255	25445	SKY ELECTRONICS	433	1A	0	27,000	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**	8	**$1,000.00**
256	10683	SLOAN VALVE CO	433	1A	6	20,677,316	0.52	77.08	17.76	52.60	2.41	7.76	**158.14**	2	**$11,586.50**
257	24585	SORINI RING MANUFACTURING CO INC	433	1A	12	1,773,000	0.00	0.03	0.43	0.16	0.00	0.89	**1.51**	7	**$1,931.08**
258	13009	SOUTH HOLLAND METAL FINISHING	433	1A	4	16,826,000	3.37	7.86	22.03	0.42	0.00	19.93	**53.61**	4	**$7,724.33**
259	13063	SOUTHWESTERN PLATING & POLISHING	413	1A	6	193,960	0.00				0.00		**0.00**	8	**$1,000.00**
260	11487	SPECIFIED PLATING CO	413	3A	194	12,168,472	0.20	34.10	4.67	1.62	0.10	134.57	**175.26**	2	**$11,586.50**
261	14635	STAR ELECTRONICS INC	433	1A	193	16,861,000	0.14	0.98	161.43	1.27	4.92	8.02	**176.76**	2	**$11,586.50**
262	24847	STERLING LABORATORIES INC	433	1A	191	3,314,388	0.03	52.33	32.84	52.52	0.06	83.56	**221.33**	2	**$11,586.50**
263	11799	STERLING LABS INC	413	1A	190	2,329,272	0.04	0.60	22.83	57.77	0.10	11.05	**92.39**	3	**$9,655.42**
264	25449	STIFFEL CO	433	1A	11	26,928,000	0.22	1.57	57.04	1.57	0.00	106.68	**167.09**	2	**$11,586.50**
265	13790	STREAMWOOD PLATING INC	413	1A	10	2,400,000	0.20				0.00		**0.20**	8	**$1,000.00**
266	10413	STROMBECKER CORP	433	2A	4	2,977,040	0.05	0.00	0.94	0.00	0.00	7.87	**8.86**	6	**$3,862.16**
267	25293	SUN CHEMICAL CORP	414	2A	4	6,225,610					0.00	13.97	**13.97**	5	**$5,793.25**
268	25279	SUNRISE ELECTRONICS	433	1A	193	4,577,000	0.04	0.11	27.41	0.19	0.61	1.95	**30.31**	4	**$7,724.33**
269	11014	SUPERIOR FINISHERS INC	413	1A	4	1,189,320	0.00				0.00		**0.00**	8	**$1,000.00**
270	10847	SWITCHCRAFT INC	433	1A	4	1,845,880	0.05	0.40	18.60	8.44	0.00	2.32	**29.80**	4	**$7,724.33**
271	12778	T W R SERVICE CORP	413	1A	7	6,789,000	0.23	1.30	20.50	26.50	1.53	61.83	**111.88**	3	**$9,655.42**
272	10134	THOMPSON STEEL CO	420	5A	4	4,078,096		0.00		0.14	0.00	2.99	**3.13**	7	**$1,931.08**
273	14260	THREE J'S INDUSTRIES INC	433	1A	7	4,247,000	0.89	42.72	4.21	0.18	0.35	10.09	**58.44**	3	**$9,655.42**
274	11473	TIARA CORP	433	1A	4	1,694,968	0.00	0.00	0.79	0.03	0.00	0.95	**1.77**	7	**$1,931.08**
275	25018	TINGSTOL COMPANY	433	1A	191	19,796,883	0.17	0.66	199.45	15.69	3.80	8.59	**228.34**	2	**$11,586.50**
276	11616	TRILLA STEEL DRUM CORP	433	1A	11	9,378,705	0.08	0.70	5.32	0.78	0.00	12.28	**19.16**	5	**$5,793.25**
277	13992	TRI-POWDERCOATING INC	433	1A	16	6,612,320	0.06	0.28	2.04	1.71	0.00	18.42	**22.50**	5	**$5,793.25**
278	10126	TRIUMPH INDUSTRIES	433	1A	47	8,083,909	0.07	3.51	3.03	1.35	0.00	72.54	**80.50**	3	**$9,655.42**
279	13233	U S PLATING CO	413	1A	189	33,899,360	105.74	121.00	171.61	245.97	0.00	269.15	**913.47**	1	**$13,517.59**
280	24397	U S STANDARD SIGN CORP	433	1A	6	15,000	0.00	0.04	0.01	0.00	0.00	0.05	**0.11**	8	**$1,000.00**
281	10720	UNION CARBIDE CORP - UCAR EMULSION	414	1A	23	10,164,000					0.25	16.44	**16.70**	5	**$5,793.25**
282	25321	UNITECH INDUSTRIES	433	1A	23	861,720	0.01	0.04	1.89	7.71	0.00	1.79	**11.44**	6	**$3,862.16**
283	25231	UNITED DISPLAY CRAFT	433	2A	8	7,343,116	0.06	0.24	8.88	1.47	0.00	8.02	**18.68**	5	**$5,793.25**
284	24950	UNITED ELECTRONICS CORP	433	2A	4	16,529,000	0.00	0.28	96.08	8.82	2.48	6.62	**114.28**	3	**$9,655.42**
285	11380	UNITED METAL FINISHERS INC	413	1A	288	8,956,080	0.15	18.60	15.76	1.49	0.22	71.11	**107.33**	3	**$9,655.42**
286	13676	UNITED RE-MANUFACTURING CO INC	433	2A	6	2,949,000	0.02	9.37	1.18	0.20	0.00	4.48	**15.25**	5	**$5,793.25**

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 17

2000 EIGHT-TIER EXTRAORDINARY MONITORING AND ENFORCEMENT CHARGES
BASED ON 1998 TMC LOADINGS

	A	B	F	AS	AT	AU	AV	AW	AX	AY	AZ	BA	BB	BC	BD
1	USER-NO	COMPANY	CAT1	OUTLET(S)	TOTAL (SAMPLES)	TOTAL TMC FLOW (GPY)	CD (LBS/YR)	CR (LBS/YR)	CU (LBS/YR)	NI (LBS/YR)	PB (LBS/YR)	ZN (LBS/YR)	TMC (LBS/YR)	TIER	EME CHARGE FOR 2000
287	10735	UNITY MANUFACTURING CO	433	1A	4	13,769,408	0.11	10.34	17.46	47.43	0.00	13.78	**89.11**	3	**$9,655.42**
288	13003	UNIVERSAL METAL FINISHING	413	3A	16	7,569,760	0.06	9.72	89.96	7.32	0.00	13.38	**120.46**	3	**$9,655.42**
289	13714	V P ANODIZING INC	433	1A	241	4,229,000	0.14	7.97	6.14	8.99	0.92	7.09	**31.25**	4	**$7,724.33**
290	13053	V P PLATING & PARISO INC	413	1A	188	1,496,300	1.41	22.44	34.43	45.46	4.07	32.31	**140.12**	2	**$11,586.50**
291	25294	VAPOR CORP	433	1A,2A	8	32,921,000	0.27	2.47	19.22	2.75	5.77	28.83	**59.31**	3	**$9,655.42**
292	11522	VERTIFLEX CO	433	2A	8	4,921,840	0.04	0.70	3.57	0.16	5.13	16.01	**25.61**	5	**$5,793.25**
293	11664	WATER SAVER FAUCET CO	433	2A	8	4,502,960	0.08	4.73	40.48	7.36	32.26	42.02	**126.93**	3	**$9,655.42**
294	24597	WEB ASSEMBLY	433	1A	14	56,940	0.00	0.01	0.06	0.01	0.00	0.68	**0.76**	7	**$1,931.08**
295	25267	WEBER-STEPHEN PRODUCTS	433	4A	4	4,486,786	0.07	26.33	3.29	0.64	0.00	7.37	**39.70**	4	**$7,724.33**
296	10158	WERNER CO	467	3A	4	3,210,416		0.00				2.25	**2.25**	7	**$1,931.08**
297	13340	WEST TOWN PLATING INC	413	2A	16	8,205,560	0.21	256.90	47.49	80.82	2.33	28.13	**415.88**	1	**$13,517.59**
298	10899	WESTERN CHAIN CO	433	1C	193	390,000	0.08	10.53	0.91	0.12	0.01	45.03	**56.69**	4	**$7,724.33**
299	10760	WESTERN RUST-PROOF CO	413	2A1	4	34,293,298	0.29	134.99	14.01	14.01	4.86	53.77	**221.94**	2	**$11,586.50**
300	10132	WHEATLAND TUBE CO	420	2A,3A	24	53,227,680					45.72	419.50	**465.23**	1	**$13,517.59**
301	24918	WHEELING PLAZA/SUPERIOR PRINTED CIRCUITS	433	1A,2A	375	5,393,240	0.13	0.31	75.16	0.36	0.54	2.38	**78.89**	3	**$9,655.42**
302	13810	WIELAND METALS SERVICE CENTER INC	468	1A	4	1,178,840		0.03	0.24	0.03	0.00	1.90	**2.19**	7	**$1,931.08**
303	11701	YALE POLISHERS & PLATERS INC	413	1A	12	4,607,680	0.04	4.77	6.30	13.91	0.00	3.84	**28.86**	5	**$5,793.25**
304	10770	ZEGERS INC	465	3A	4	6,160,000		25.74				12.12	**37.86**	4	**$7,724.33**
305	10774	ZENITH ELECTRONICS CORP (RAULAND)	469	1A	7	320,725,848	0.00	235.39			165.84	853.28	**1,254.51**	1	**$13,517.59**
306	**TOTALS:**	**304 TMC CATEGORICAL SIUs**		**319**	**12,434**	**5,511,565,185**	**667**	**19,083**	**9,130**	**7,918**	**1,083**	**18,521**	**56,402**		**$2,092,672.54**

TABLE 17

2000 EIGHT-TIER EXTRAORDINARY MONITORING AND ENFORCEMENT CHARGES
BASED ON 1998 TMC LOADINGS

Cell: A2
Comment: Formerly U10402. Moved from 5700 Touhy Ave. in Sept 1998. Flows from old facility used to determine EME flow. ANALYTICAL DATA OBTAINED FROM U10402's STUDY 2/23-28/98. STUDIES AT THIS FACILITY LATER IN THE YEAR CONSISTED OF GRAB SAMPLES ONLY.

Cell: A4
Comment: VOLUME BASED ON UC VERIFIED FLOW SPLIT (FROM 1998 APPROVED FLOW SPLIT LIST)

Cell: A8
Comment: COMPANY REGULATED AS 433 ON 6/3/97.

Cell: A12
Comment: 1A BATCH DISCHARGE REPORTED ON DAR = 500GPB X 2 DISCHARGES PER WEEK. APPEAL No. 98D-002 ESTABLISHED TOTAL VOLUME "PER YEAR" IS 636,500 GPY AND PROCESS VOLUME "PER YEAR" = 39,420 GPY. PER D. BYRON, USE TOTAL VOLUME CLEARED FOR 1998 (628,320) AND 39,420 GPY (AS ESTABLISHED BY THE APPEAL) FOR PROCESS FLOW. USE 39,420 GPY EVERY YEAR FOR PROCESS FLOW UNTIL ADVISED OTHERWISE.

Cell: A15
Comment: VOLUME BASED ON UC VERIFIED FLOW SPLIT.

Cell: A16
Comment: NO UC FLOW SPLIT. TOTAL PLANT FLOW APPLIED TO STA 1A. COMPANY IS OPEN BUT DOESN'T REALLY DO PLATING ANY MORE. PLATING TANKS ARE STILL ON SITE AND FILLED WITH PLATING SOLUTION.

Cell: A17
Comment: COMPANY REPORTED TWO DISCHARGES IN 1998. TOTAL SHOWN.

Cell: A20
Comment: STA 1C (BATCH) VOLUME BASED ON COMPANY REPORTING 4 DISCHARGES IN 1998. EACH DISCHARGE ESTIMATED @ 88 GALLONS. MEAN DATA FROM 1C DATA FROM 1998 STUDIES.

Cell: A21
Comment: STA 1A (BATCH) VOLUME BASED ON RD-115 AVG (1st RPT=1,646GPD 2nd RPT= 5,315GPD) X 260 WORKING DAYS.

Cell: A22
Comment: STA 1A (BATCH) VOLUME BASED ON RD-115 AVG (1st RPT=3,542 GPD 2nd RPT= 1,464 GPD) X 2 DISCHARGES PER DAY X 260 WORKING DAYS.

Cell: A23
Comment: 1998 TOTAL FLOW BASED ON 6/29/98 RD-115 (68,941 GPD X 310 WORKING DAYS).

Cell: A28
Comment: FORMERLY U11402. Total flow = RD-115 avg x 260 working days (taken from 2/15/98 and 8/17/98 RD-115s). FEB 1998 INSPECTION VERIFIED 2A (OUTSIDE STATION) AS COMPANY'S FINAL DISCHARGE POINT. ONLY DATA FROM 2/23-27/98 USED TO COMPUTE EME; ALL OTHER DATA FROM YEAR CONSISTED OF ONE HOUR COMPOSITES.

Cell: A33
Comment: COMPANY MOVED FROM 2241 S INDIANA (10273) TO NEW FACILITY AT 3941 S KEELER (25577) DURING (25577) DA ISSUED 11/1.99.

Cell: A35
Comment: VOLUME BASED ON UC VERIFIED FLOW SPLIT.

Cell: A37
Comment: No UC approved flow split for 1998. Total plant flow applied to !A.

Cell: A42
Comment: COMPANY REPORTED ONE DISCHARGE PER DAY. 4,925 GPB (24,625 PER WEEK) X 52 WEEKS. STATION 1A DATA FROM 2/9/98 NOT USED TO COMPUTE EME BECAUSE OF TCR ANOMOLY.

Cell: A45
Comment: VOLUME BASED ON UC VERIFIED FLOW SPLIT.

Cell: A46
Comment: VOLUME FOR STA 1A BASED ON UC VERIFIED FLOW SPLIT.

Cell: A55
Comment: No UC approved flow split. Total 1998 flow volume (applied to 1A) from 8/14/98 RD-115 regulated flow 8246 gpd x 253 working days.

Cell: A57

TABLE 17

2000 EIGHT-TIER EXTRAORDINARY MONITORING AND ENFORCEMENT CHARGES BASED ON 1998 TMC LOADINGS

Comment: No UC approved flow split for 1998. Total flow applied to 1A.

Cell: A59
Comment: APPEAL NO. 99D-056 ESTABLISHED FLOW SPLIT FOR 1998's RD-925. VOLUME FOR STATION 1A USED.

Cell: A62
Comment: VOLUME BASED ON UC VERIFIED FLOW SPLIT.

APPEAL No. 98d-082 HAD NO EFFECT ON EME. THEREFORE, NO ADJUSTMENTS WERE MADE.

Cell: A63
Comment: NO UC FLOW SPLIT FOR 1998.

Cell: A70
Comment: PER APPEAL 99D-005, 1999 EME CALCULATED USING 1998 VOLUME APPLIED TO 1996 TMC LOADINGS TO EQUAL 154.69 POUNDS. FOR YEAR 2000, USED 1998 VOLUME AGAIN.

Cell: A73
Comment: STATION 2A REPLACED STATION 1A ON MAY 1, 1998. FLOW PRORATED: 1A FLOW = 20,495,200*(120/365); 2A FLOW = 20,495,200*(245/365).

Cell: A75
Comment: NO UC APPROVED FLOW SPLIT. TOTAL PLANT FLOW USED.

Cell: A76
Comment: NO UC FLOW SPLIT. TOTAL PLANT FLOW APPLIED TO STA 2A.

Cell: A77
Comment: VOLUME BASED ON STA 4C TOTALIZER READINGS BY IWD FROM 1/6/98 TO 1/18/99 = 357,295 GPY.

Cell: A78
Comment: 1998 VOLUME BASED ON UC VERIFIED FLOW SPLIT.

Cell: A80
Comment: UC VERIFIED FLOW SPLIT FOR 1998.

Cell: A82
Comment: NO UC FLOW SPLIT. TOTAL PLANT FLOW APPLIED TO STA 1A.

Cell: A83
Comment: 1998 Batch discharge flows provided by company.

Cell: A84
Comment: NO UC FLOW SPLIT. TOTAL PLANT FLOW APPLIED TO STA 1A.

Cell: A85
Comment: 1998 VOLUME BASED ON UC VERIFIED FLOW SPLIT.

Cell: A86
Comment: 1998 FLOW BASED ON UC APPROVED FLOW SPLIT.

Cell: A87
Comment: NO UC FLOW SPLIT. TOTAL 1998 PLANT FLOW APPLIED TO STA 2A.

Cell: A91
Comment: 0A TRANSFERRED 7/30/99 FROM FAIL SAFE LIGHTING (15525) TO COOPER LIGHTING (25559). NO 1998 UC FLOW SPLIT. TOTAL PLANT FLOW APPLIED TO STA 1A.

Cell: A94
Comment: VOLUME BASED ON AVERAGE RD-115 PROCESS FLOW REPORTED ON 3/10/98 AND 10/27/98. [(493 + 457) / 2] X 255 WORKING DAYS = 121,125 GPY.

Cell: A95
Comment: 1998 VOLUME BASED ON UC VERIFIED FLOW SPLIT FOR STA 21A (TOTALIZER READINGS).

Cell: A97

TABLE 17

2000 EIGHT-TIER EXTRAORDINARY MONITORING AND ENFORCEMENT CHARGES
BASED ON 1998 TMC LOADINGS

Comment: PER UC APPEAL 95D-032 (LTR 8/18/95), COMPANY GRANTED FLOW SPLIT TO ESTABLISH EME FOR DISCHARGE THROUGH STATION 1C. 1C VOLUME APPLIED TO DATA FROM 1C.

Cell: A98
Comment: NO UC FLOW SPLIT. TOTAL PLANT FLOW APPLIED TO 1A.

Cell: A100
Comment: STA 1C (BATCH) VOLUME BASED ON 1,300/BATCH (DAR) TIMES 23 DISCHARGES IN 1998.

Cell: A101
Comment: NO 1998 UC FLOW SPLIT. TOTAL PLANT FLOW APPLIED TO STA 1A.

Cell: A102
Comment: STA 1A (BATCH) VOLUME BASED ON DAR INDICATED VOLUME. THE DA HAS INCORPORATED THIS VOLUME. 7,500 GAL/BATCH DISCHARGED DAILY X 312 WORKDAYS.

Cell: A105
Comment: COMPANY WAS U13255 (DALTON ALUMINUM) USED DATA FROM CLEARED 1998 DATA FROM EASCO. THE DA WAS TRANSFERRED FROM DOLTON TO EASCO ON 7/31/98. TOTAL FLOW INDICATED IS FROM ENTIRE YEAR. COMPANY HAS NOT CHANGED OPERATIONS. DATA FROM 5/27/98 NOT USED--21 HOUR COMPOSITE (NOT BETWEEN 22 AND 26 HOURS).

Cell: A107
Comment: 1998 VOLUME BASED ON UC VERIFIED FLOW SPLIT.

Cell: A109
Comment: NO UC FLOW SPLIT TOTAL 1998 PLANT FLOW APPLIED TO STA 1A.

Cell: A112
Comment: VOLUME BASED ON 1998 UC VERIFIED FLOW.

Cell: A113
Comment: STA 1A (BATCH) VOLUME BASED ON DAR REPORTED BATCH DISCHARGE VOLUME (2,300 GPB) X 4 DISCHARGES FOR 1998 = 9200 GALLONS DISCHARGED PER YEAR.

Cell: A114
Comment: 1998 VOLUME BASED ON UC APPROVED FLOW SPLIT.

Cell: A115
Comment: STA 1C (BATCH) VOLUME BASED ON DAR SUBMITTED BY COMPANY 9/1/97. 1300 GPD X 240 WORKING DAYS.

Cell: A117
Comment: USED 2/15/98 AND 10/29/98 RD-115 AVG PROCESS FLOW 5673 GPD X 263 WORKING DAYS.

Cell: A118
Comment: DA ISSUED ON 2/27/98. NO UC CLEARED DATA FOR 1998. USED 8/15/98 RD-115 AVG PROCESS FLOW 7000 GPD X PRORATED NUMBER OF WORKING DAYS (215) = 1,505,000 GPY. NO DISTRICT SAMPLING DATA FOR 1998; USED DATA SUPPLIED WITH RD-115

Cell: A119
Comment: NO UC FLOW SPLIT TOTAL PLANT FLOW APPLIED TO STA 1.

Cell: A121
Comment: VOLUME BASED ON UC VERIFIED FLOW SPLIT.

Cell: A122
Comment: VOLUME BASED ON ONLY ONE DISCHARGE FROM STATION 1C AND 2C DURING 1998. DATA WAS OBTAINED FROM STATION 1A (BATCH FLOWS THROUGH STATION 1A).

Cell: A123
Comment: COMPANY MOVED 9/99. EME INCURRED AT OLD FACILITY (24805) SENT TO NEW FACILITY (25554).

Cell: A124
Comment: VOLUME BASED ON UC VERIFIED FLOW SPLIT.

Cell: A126
Comment: NO BATCH DISCHARGES IN 1998.

Cell: A127

TABLE 17

2000 EIGHT-TIER EXTRAORDINARY MONITORING AND ENFORCEMENT CHARGES
BASED ON 1998 TMC LOADINGS

Comment: NO UC FLOW SPLIT TOTAL 1998 PLANT FLOW APPLIED TO STA 1A.

Cell: A129
Comment: NO UC FLOW SPLIT TOTAL 1998 PLANT FLOW APPLIED TO STA 1A.

Cell: A130
Comment: NO UC FLOW SPLIT TOTAL 1998 PLANT FLOW APPLIED TO STA 1A.

Cell: A135
Comment: 1998 VOLUME BASED ON COMPANY SELF REPORTED BATCH DISCHARGE INFORMATION.

Cell: A136
Comment: DA ISSUED 9/14/98. PROCESS FLOWS FROM ORIGINAL DAR USED TO DETERMINE FLOW (1200 GPD X 77 PRORATED NUMBER OF WORKING DAYS = 92,400 GPY).

Cell: A137
Comment: 1998 VOLUME BASED ON 1,200 GAL X 2 BATCHES/WEEK X 50 WEEKS.

Cell: A138
Comment: NO UC FLOW SPLIT TOTAL 1998 PLANT FLOW APPLIED TO STA A1.

Cell: A139
Comment: NO UC FLOW SPLIT TOTAL 1998 PLANT FLOW APPLIED TO STA 2A.

Cell: A141
Comment: 1998 VOLUME BASED ON UC VERIFIED FLOW SPLIT.

Cell: A142
Comment: NO UC FLOW SPLIT TOTAL 1998 PLANT FLOW APPLIED TO STA 1A.

Cell: A144
Comment: DA TRANSFERRED FROM U11861 TO U25575 ON 7/8/99.
NO UC FLOW SPLIT. TOTAL PLANT FLOW APPLIED TO STA 1A.

Cell: A145
Comment: 1998 VOLUME BASED ON UC VERIFIED FLOW SPLIT,

Cell: A148
Comment: 1998 BASED ON UC VERIFIED FLOW SPLIT.

Cell: A150
Comment: NO UC FLOW DATA. USED AVG OF REGULATED PROCESS FLOWS REPORTED ON 4/98 & 10/98 RD-115s (7738 GPD + 9120 GPD)/2 X 280 WORKING DAYS.

Cell: A152
Comment: NO UC FLOW SPLIT TOTAL 1998 PLANT FLOW APPLIED TO STA 1A.

Cell: A154
Comment: COMPANY REP STATED THAT 1000 TO 2000 GALLONS ARE DISCHARGED ONCE PER WEEK. 1500 GAL AVG X 52 WEEKS = 78000 GPY. THE CURRENT DA INDICATES COMPANY DISCHARGES 1,700 MAX PER BATCH DISCHARGE.

Cell: A156
Comment: WAS U21860 (SAME NAME/SAME ADDRESS). DATA FOR 1998 TAKEN FROM UC CLEARED VOLUME FOR U21860.

Cell: A157
Comment: NO UC FLOW SPLIT TOTAL 1998 PLANT FLOW APPLIED TO STA 2A.

Cell: A158
Comment: NO UC FLOW SPLIT TOTAL 1998 PLANT FLOW APPLIED TO STA 1A.

Cell: A159
Comment: NO UC FLOW SPLIT TOTAL 1998 PLANT FLOW APPLIED TO STA 1A.

Cell: A160
Comment: NO UC DATA FOR 1998. USED AVG PROCESS FLOW FROM 4/98 AND 10/98's RD-115 X 250 WORKING DAYS(10881 GPD X 250)

TABLE 17

2000 EIGHT-TIER EXTRAORDINARY MONITORING AND ENFORCEMENT CHARGES BASED ON 1998 TMC LOADINGS

Cell: A161
Comment: NO UC DATA FOR 1998. USED AVG PROCESS FLOW FROM 4/98 AND 10/98's RD-115 (10196 GPD X 250).

Cell: A162
Comment: STA 1C (BATCH) VOLUME BASED ON REPORTED DISCHARGE OF 650 GAL PER WEEK.

Cell: A164
Comment: STA 2A (BATCH) VOLUME BASED ON DISCHARGE OF 300 GALLONS PER WEEK FROM COMPANY'S QUARTERLY BATCH DISCHARGE SCHEDULE.

Cell: A165
Comment: NO UC FLOW SPLIT.TOTAL 1998 PLANT FLOW APPLIED TO STA 4A.

Cell: A168
Comment: 1998 VOLUME BASED ON UC VERIFIED FLOW SPLIT.

Cell: A175
Comment: STA 1C (BATCH) VOLUME BASED ON APPROXIMATELY 1000 GALLONS DISCHARGED PER QUARTER, AS REPORTED BY COMPANY ON THEIR QUARTERLY BATCH DISCHARGE SCHEDULES.

Cell: A179
Comment: NO UC APPROVED FLOW SPLIT. APPLY HIGHEST DATA FROM EACH OUTLET (2A OR 3A) TO TOTAL PLANT FLOW.

Cell: A180
Comment: NO UC FLOW SPLIT. TOTAL PLANT FLOW APPLIED TO STATION 2A DATA.

Cell: A184
Comment: STA 1C (BATCH) VOLUME BASED ON REPORTED DISCHARGE OF 500 GALLONS 3 TIMES PER MONTH.

Cell: A185
Comment: NO UC APPROVED FLOW SPLIT. APPLIED TOTAL VOLUME TO STA 1A. MASS LIMIT FOR CR+, PB, ZN AT 1A FOR 1998.

Cell: A187
Comment: 1998 VOLUME FOR 2A BASED ON UC VERIFIED FLOW SPLIT.

Cell: A189
Comment: BATCH DISCHARGE 2X ANNUALLY (1900 GAL X 2 = 3800 GPY). DA NEEDS TO BE UPDATED TO REFLECT THE FACT THAT COMPANY DOES NOT BATCH DISCHARGE TO 1A DAILY (NOTIFIED DM ON 8/25/99), AS WAS THOUGHT FOR ESTABLISHING 1997 FLOWS.

Cell: A190
Comment: VOLUME BASED ON UC VERIFIED FLOW SPLIT.

Cell: A191
Comment: 1998 VOLUME BASED ON UC VERIFIED FLOW SPLIT.

Cell: A192
Comment: BATCH DISCHARGES VOLUME BASED ON COMPANY'S QUARTERLY SUBMITTED BATCH DISCHARGE SCHEDULE. 4000 GALLONS TOTAL DISCHARGED FOR 1998.

STARTING 1/1/99, 4C IS THE PRETREATMENT STATION AND STATION 1C IS DEACTIVATED.

Cell: A193
Comment: NO UC APPROVED FLOW SPLIT. TOTAL FLOW APPLIED TO 1A.

Cell: A194
Comment: ONE BATCH DISCHARGE TO STA 1C ON 7/20/98. DISCHARGE OCCURS ONCE EVERY 2 OR 3 YEARS.

Cell: A196
Comment: NO UC APPROVED FLOW SPLIT. TOTAL FLOW APPLIED TO STA 1A.

Cell: A198
Comment: COMPANY BATCH DISCHARGES THROUGH 1C AND 2C EVERY TWO WEEKS. 250 GALLONS PER BATCH IS DISCHARGED THROUGH STATION 1C AND 500 THROUGH SATION 2C. THEREFORE, 6,500 GALLONS PER YEAR ARE DISCHARGED THROUGH 1C AND 13,000 GALLONS PER YEAR THROUGH 2C. TOTAL 19,500. FIGURES OBTAINED FROM FIELD INSPECTION INTERVIEW WITH COMPANY REP.

Cell: A199

TABLE 17

2000 EIGHT-TIER EXTRAORDINARY MONITORING AND ENFORCEMENT CHARGES BASED ON 1998 TMC LOADINGS

Comment: STA 1C (BATCH) VOLUME BASED ON 68 SCHEDULED BATCH DISCHARGES TIMES AVG 1723 GAL PER BATCH. DATA FROM 2/7/98 NOT USED TO COMPUTE EME--ONE HOUR COMPOSITE.

Cell: A202
Comment: DA ISSUED 7/8/98. USED DAR PROCESS FLOW (19,200 GPD X 126 WORKING DAYS). DATA OBTAINED AT STATION 1A ON 10/26/98 NOT USED IN COMPUTATIONS FOR EME DUE TO HIGH NICKEL ANOMOLY. ALL USED DATA WERE ONE HOUR COMPOSITES.

Cell: A204
Comment: 1998 VOLUME BASED ON UC VERIFIED FLOW SPLIT.

Cell: A205
Comment: NO UC FLOW SPLIT TOTAL PLANT FLOW APPPLIED TO STA 2A

Cell: A206
Comment: NO UC FLOW SPLIT HIGHEST CONCENTRTIONS FROM STA 1A,2A &3A APPLIED TO TOTAL PLANT FLOW

Cell: A208
Comment: NO UC FLOW SPLIT TOTAL PLANT FLOW APPLIED TO STA 1A.

Cell: A209
Comment: VOLUME BASED ON UC VERIFIED 1998 FLOW SPLIT.

Cell: A210
Comment: COMPANY DISCHARGES 24,370 GPB, 3X PER WEEK (24,370 X 156 DISCHARGES PER YEAR = 3,801,600 GPY. OBTAINED FROM DAR AND FIELD REPORT NARRATIVES.

Cell: A212
Comment: NO UC FLOW SPLIT TOTAL PLANT FLOW APPLIED TO STA 2A.

Cell: A216
Comment: NO UC FLOW SPLIT TOTAL PLANT FLOW APPLIED TO STA 1A.

Cell: A218
Comment: NO UC FLOW SPLIT TOTAL PLANT FLOW APPLIED TO STA 1A.

Cell: A219
Comment: VOLUME BASED ON UC VERIFIED FLOW SPLIT.

Cell: A220
Comment: VOLUME BASED ON UC VERIFIED FLOW SPLIT.

Cell: A221
Comment: VOLUME BASED ON UC VERIFED FLOW SPLIT.

Cell: A222
Comment: NO UC FLOW SPLIT TOTAL PLANT FLOW APPLIED TO STA 2A.

Cell: A224
Comment: UC APPROVED FLOW SPLIT (SEE UC LTR 6/9/95) FOR STATION 1A FOR EVERY YEAR.

Cell: A229
Comment: VOLUME BASED ON UC VERIFIED FLOW SPLIT.

Cell: A230
Comment: NO UC FLOW SPLIT TOTAL PLANT FLOW APPLIED TO STA 1A.

Cell: A232
Comment: STA 2A (BATCH) VOLUME BASED ON 2500 gal/batch discharge x 4 times per day x 310 working days per year. Figures obtained from company reported volume and interviews with field office.

Cell: A233
Comment: NO UC FLOW SPLIT TOTAL PLANT FLOW APPLIED TO STA 1A.

Cell: A234
Comment: NO UC FLOW SPLIT HIGHEST CONCENTRATIONS FROM STA 6A & 11A APPLIED TO TOTAL PLANT FLOW.

TABLE 17

2000 EIGHT-TIER EXTRAORDINARY MONITORING AND ENFORCEMENT CHARGES
BASED ON 1998 TMC LOADINGS

Cell: A235
Comment: NO UC FLOW SPLIT ALLOWED. TOTAL PLANT FLOW APPLIED TO STA 3A.
NOTE: 2A FLOWS TO 3A.

Cell: A236
Comment: NO UC FLOW SPLIT TOTAL PLANT FLOW APPLIED TO STA 1A.

Cell: A237
Comment: FORMERLY U15095 REPUBLIC ENGINEERED STEEL CO. DA TRANSFERRED 9/13/99.
NO UC FLOW SPLIT. HIGHEST CONCENTRATIONS FROM STA 1C AND 2C (ONLY STATIONS SAMPLED BY DISTRICT IN 1998) APPLIED TO PROCESS FLOW OBTAINED FROM COMPANY'S 1998 RD-115's ((255,857 +145,833) / 2 X 365 WORKING DAYS = 73,308,425 GPY. IN PAST YEARS, HIGHEST CONCENTRATIONS OF DATA FROM STATIONS 5A AND 6A ARE APPLIED TO TOTAL PLANT FLOW, AS CLEARED BY UC.

Cell: A240
Comment: VOLUME BASED ON UC VERIFIED FLOW SPLIT.

Cell: A242
Comment: NO UC FLOW SPLIT . HIGHEST CONCENTRATIONS FROM STA 3A & 4A APPLIED TO TOTAL PLANT FLOW.

Cell: A243
Comment: APPLIED UC VERIFIED FLOW SPLIT FOR STA 1A.

Cell: A245
Comment: NO UC FLOW SPLIT TOTAL PLANT FLOW APPLIED TO STA 1A.

Cell: A246
Comment: NO UC FLOW SPLIT. TOTAL PLANT FLOW APPLIED TO STA 1A. SPILL OCCURRED ON 8/17/98 AND 8/19/98. DATA FROM THESE DAYS NOT USED TO CALCULATE EM E.

Cell: A247
Comment: STA 1C (BATCH) VOLUME BASED ON SELF-REPORTED DATA (165 GPD X 312 WORKDAYS).

Cell: A248
Comment: NO UC FLOW SPLIT TOTAL PLANT FLOW APPLIED TO STA 2A.

Cell: A249
Comment: NO UC FLOW DATA. COMPANY DID NOT FILE FOR 1998. STATION 2A BECAME THE FINAL OUTFALL BEGINNING MAY 4, 1998. DISTRICT CONTINUOUS MONITORING SWITCHED FROM 1A TO 2A ON 5/4/98. STATION 2A, WHICH RECEIVES ALL FLOW FROM THE FACILITY, IS LOCATED DOWNSTREAM OF STATION 1A. IN ADDITION, COMPANY WAS GRANTED (LTR 11/8/95) A FLOW SPLIT BY WHICH A SUBMETER WOULD MEASURE PROCESS FLOW TO 1A. PER D. BYRON, STATION 1A DATA (1/1/98 TO 5/3/98) IS APPLIED TO THE PROCESS FLOW ESTABLISHED BY SUBMETER READINGS FOR THE 1/1/98 TO 5/3/98 SAMPLING PERIOD. INCOMING METER READINGS FOR PERIOD 5/4/98 TO 12/31/98 IS APPLIED TO ANALYTICAL DATA FROM STA 2A OBTAINED DURING THIS PERIOD.

Cell: A250
Comment: VOLUME BASED ON UC VERIFIED FLOW SPLIT.

Cell: A251
Comment: STA 1C (BATCH) VOLUME BASED ON 1998 RD-115s X 312 WORKDAYS.

Cell: A252
Comment: UC APPROVED FLOW SPLIT.

Cell: A255
Comment: DA ISSUED 12/4/98. PRORATE PROCESS VOLUME FOR 27 WORKING DAYS TAKEN FROM DAR (1000 GPD X 27 WORKING DAYS). NO SAMPLING DATA AVAILABLE FOR 1998. DEMINIMUS EME CHARGE.

Cell: A259
Comment: NO DISTRICT DATA FOR 1998. USED COMPANY SELF-REPORTED RD-115 DATA FOR 1998.

Cell: A263
Comment: NO UC FLOW SPLIT TOTAL PLANT FLOW APPLIED TO STA 1A.

Cell: A264
Comment: U25449 STARTED OPERATIONS AROUND AUGUST 1998. NEW FACILITY (U25449); OLD FACILITY (U13253).

UC APPROVED FLOW SPLIT (1A + 2A COMBINED) FOR OLD FACILITY. TOTAL = 20,158,600. ADDED THIS FIGURE TO TOTAL CLEARED FOR NEW FACILITY (6,769,400). TOTAL CLEARED = 26,928,000 FOR BOTH FACILITIES IN 1998. UC APPROVED THIS SPLIT BECAUSE THE COMPANY FILED FOR 1998 FOR BOTH COMPANIES ON THE SAME RD-925.

TABLE 17

2000 EIGHT-TIER EXTRAORDINARY MONITORING AND ENFORCEMENT CHARGES
BASED ON 1998 TMC LOADINGS

USED DISTRICT DATA FROM NEW FACILTY (NO DISTRICT 1998 DATA FOR OLD FACILITY) AND AVERAGED DATA WITH NEW COMPANY'S DATA FROM THEIR DAR. DID NOT INCLUDE DISTRICT DATA FROM 12/4/98 (72-HOUR COMPOSITE).

NOTE: 1997 DATA FROM OLD COMPANY COMPARES CLOSELY TO NEW COMPANY'S DATA.

Cell: A267
Comment: UC APPROVED FLOW SPLIT. EME APPLICABLE TO VOLUME THROUGH 2A ONLY. FLOW SPLIT IS GOOD EVERY YEAR (SEE UC LTR 3/19/99)

Cell: A270
Comment: VOLUME BASED ON UC VERIFIED FLOW SPLIT.

Cell: A272
Comment: NO UC FLOW SPLIT. TOTAL PLANT FLOW APPLIED TO STA 5A.

Cell: A275
Comment: VOLUME BASED ON UC VERIFIED FLOW SPLIT.

Cell: A279
Comment: NO UC FLOW SPLIT. TOTAL PLANT FLOW APPLIED TO STA 1A.

Cell: A280
Comment: FIELD NARRATIVE FROM 10/98 INDICATED 1 BATCH DISCHARGE EVERY TWO WEEKS. COMPANY'S RD-115s INDICATED 60 GPD OF PROCESS WATER DISCHARGED. VOLUME APPLICABLE TO UNSCHEDULED BATCH DISCHARGE (60 GPD AVG X 250 WORKING DAYS).

Cell: A281
Comment: VOLUME BASED ON UC VERIFIED FLOW SPLIT.

Cell: A282
Comment: DA ISSUED 5/6/98. USED 2/98 AND 8/98 AVG RD-115 PROCESS FLOW 5160 GPD X (ORIRATED) 167 WORKING DAYS.

Cell: A283
Comment: NO UC FLOW SPLIT. APPLIED TOTAL FLOW TO STA 2A.

Cell: A284
Comment: NO UC FLOW SPLIT. TOTAL PLANT FLOW APPLIED TO STA 2A.

Cell: A285
Comment: NO UC FLOW SPLIT. TOTAL PLANT FLOW APPLIED TO STA 1A.

Cell: A287
Comment: VOLUME BASED ON UC VERIFIED FLOW SPLIT.

Cell: A288
Comment: NO UC FLOW SPLIT TOTAL UC FLOW APPLIED TO STA 3A.

Cell: A289
Comment: NO UC FLOW SPLIT. TOTAL PLANT FLOW APPLIED TO STA 1A.

Cell: A291
Comment: NO UC FLOW SPLIT. TOTAL PLANT FLOW APPLIED TO STA 1A. DATA AVAILABLE FROM BOTH STATIONS 1A AND 2A. USE HIGHEST CONCENTRATIONS APPLIED TO TOTAL FLOW.

Cell: A294
Comment: 1A BATCH DISCHARGE VOLUME BASED ON FIELD REPORTS AND BATCH DISCHARGE REPORTS.

Cell: A295
Comment: VOLUME BASED ON UC VERIFIED FLOW SPLIT.

Cell: A296
Comment: PER APPEAL 99D-088, UC APPROVED FLOW SPLIT FOR 1998.

Cell: A298

TABLE 17

2000 EIGHT-TIER EXTRAORDINARY MONITORING AND ENFORCEMENT CHARGES BASED ON 1998 TMC LOADINGS

Comment: STA 1C (BATCH) VOLUME BASED ON PRESIDENT OF COMPANY REPORTED TOTAL BATCH DISCHARGE VOLUME

Cell: A299
Comment: VOLUME BASED ON UC VERIFIED FLOW SPLIT.

Cell: A300
Comment: NOTE: 1C FLOWS TO 2A AND 2C FLOWS TO 3A. FOR 1998, NO UC FLOW SPLIT. TOOK HIGHEST CONCENTRATIONS FROM 2A AND 3A AND APPLIED TO TOTAL FLOW.

Cell: A301
Comment: PER REQUEST FROM C. O'CONNER, NAME REFLECTS RESPONSIBLE PAYER. NO UC FLOW DATA. USED AVG REGULATED PROCESS FLOW REPORTED ON 2/98 & 8/98 RD-115s (22801 GPD X 360 WORKING DAYS). NO UC VERIFIED FLOW SPLIT APPLIED HIGHEST CONCENTRATIONS FROM STA 1A & 2A TO CALCULATED PROCESS FLOW.

Cell: A302
Comment: STA 1A (BATCH) VOLUME BASED ON AVG 1998 RD-115 SELF-REPORTED FLOWS (3750 GPD & 5318 GPD) TIMES 260 WORK DAYS. COMPANY DID NOT SUBMIT BATCH DISCHARGE SCHEDULES IN 1998. COMPANY DID SUBMIT BATCH DISCHARGE SCHEDULES FOR 1999 WHICH SHOWED 1691 GAL/BATCH X 3 OR 4 DISCHARGES PER DAY TIMES 310 WORKING DAYS (= 1,634,735 TOTAL DISCHARGED FOR 1999).

Cell: A304
Comment: NO UC VERIFIED FLOW SPLIT. COMPANY WAS SAMPLED AT A STATION WHICH COMBINED ALL FLOWS. THIS STATION IS DESIGNATED 3A. 3A HAS SINCE BEEN DEACTIVATED AND 1A IS ACTIVE IN 1999. DATA IN LIMS IS UNDER STATION 3A.