

Protecting Our Water Environment



Metropolitan Water Reclamation District of Greater Chicago

**RESEARCH AND DEVELOPMENT
DEPARTMENT**

REPORT NO. 01-6

**CALCULATION OF USER CHARGE RATES AND
ADMINISTRATIVE COSTS FOR 2001**

March 2001

Metropolitan Water Reclamation District of Greater Chicago
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**CALCULATION OF USER CHARGE RATES AND
ADMINISTRATIVE COSTS FOR 2001**

Research and Development Department
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CALCULATION OF 2001 USER CHARGE RATES

Determination of Total Operations, Maintenance, and Replacement (OM&R) Costs

The 2000 Metropolitan Water Reclamation District of Greater Chicago (District) Corporate Fund appropriates \$314,500,000 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 \$298,938,808 of the 2000 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 \$11,669,659. 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 \$3,791,533. The total of the eliminated funds considered to be non-OM&R related is \$15,461,192. Three additional funds, portions of the Annuity and Benefit Fund (\$27,724,157), the Reserve Claim Fund (\$7,111,000), and the Construction and Working Cash Fund (\$13,008,958) are added to the OM&R costs, raising the total OM&R cost from \$298,938,808 to \$346,782,923. 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 1960s, 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 2000 & 2001

Budgeted Corporate Fund Programs Directly Related to OM&R Costs	1999 Budget	2000 Budget
1000 Collection	\$ 65,200,000	\$ 67,800,000 ¹
2000 Treatment	61,600,000	68,300,000 ¹
3000 Solids Processing	34,800,000	34,900,000 ¹
4000 Flood and Pollution Control	24,399,534	25,430,341 ^{1,2}
5000 Solids Utilization	26,600,000	29,200,000 ¹
7000 General Support	<u>71,336,448</u>	<u>73,308,467^{1,3}</u>
Sub-Total	\$ 283,935,982	\$ 298,938,808
Annuity and Benefit Fund	22,826,920	27,724,157 ⁴
Reserve Claim Fund	4,478,000	7,111,000 ⁵
Construction & Working Cash Fund	<u>6,183,725</u>	<u>13,008,958⁶</u>
Sub-Total	\$ 33,488,645	\$ 47,844,115
Total OM&R Cost	\$ 317,424,627	346,782,923

¹ See Pages 45, 229 and 246 of the District's 2000 Budget.

² Program total in Corporate Fund is \$37,100,000. USEPA disallowed costs (Programs 4200, 4700, and 4800) are \$11,669,659, leaving a net of \$25,430,341.

³ Program total in Corporate Fund is \$77,100,000. USEPA disallowed costs are \$3,791,533, leaving a net of \$73,308,467. 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 (\$11,669,659) to the total for Programs 1000 through 5000 (\$237,300,000) in the 2000 Budget.

⁴ The 2000 Budget allocates \$29,627,324 on Page 47 to the Annuity and Pension Fund. Approximately 6.42% of the District's employees and their expenses are not chargeable to the Corporate Fund leaving a net of \$27,724,157. The 6.42% 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.

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TABLE 1A
RESERVE CLAIM FUND

2000 Budget	\$15,000,000
Less 1999 Budget	\$12,600,000
Plus 1999 Actual Claims	\$ 4,711,000
Total	\$ 7,111,000

Note: Included for the User Charge System are actual expenditures in 1999 plus the amount added to the fund which is the difference in the budget appropriations for 1999 (Page 47 of 1999 Budget) and 2000 (Page 47 of 2000 Budget). The total represents the funding required to bring the fund up to the 2000 appropriated amount. The data for actual claims was provided by the Finance Department on April 17, 2000.

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TABLE 1B

CONSTRUCTION FUND COSTS

Budgeted Programs Directly Related to OM&R Cost	2000 Budget
1000 Collection	\$ 22,191,727.00
2000 Treatment	49,201,972.00
3000 Solids Processing	17,688,527.00
4000 Flood and Pollution Control	12,362,459.00
5000 Solids Utilization	1,035,146.00
Subtotal of Programs 1000 through 5000	\$102,479,831.00
Less ineligible portion of OM&R Cost applicable to Programs 4200, 4210, 4700 and 4800	12,362,459.00
Eligible OM&R Cost from Programs 1000 through 5000	\$ 90,117,372.00
Ratio of eligible to total program cost <u>\$90,117,372</u> = 0.879 <u>\$101,479,831</u>	
7000 Plus General Support (eligible portion) = 0.879 x \$639,268	562,151.00
Total Eligible OM&R Cost	\$ 90,679,523.00

Sources: Information provided by General Administration on June 26, 2000.

and improvement of water reclamation plants (WRPs), construction of new WRPs 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 2000 budget is \$26,801,500, as shown on Table 1D, Page 7. The 2000 Construction Working Cash Fund is \$3,693,048. (See Page 77 of the 2000 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 \$13,008,958, as shown on Table 1C.

Determination of Total Revenue to be Generated by UCS in 2001

As shown in Table 2, revenues contained in the 2000 budget derived from sources other than the UCS total \$96,026,275. Deducting this amount from the total OM&R cost of \$346,782,923 leaves \$250,756,648 to be generated by the UCS in 2001, a 13.7 percent change from the \$220,622,914 which was to be generated in 2000. 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 UCS.

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 2001 from 2000 Budget
Net Assets Appropriable (Page 70, 2000 Budget)	\$ 43,571,400.00
Revenue from Current Services	
Grants (Page 89, 2000 Budget)	\$ 1,000,000.00
Revenue from Personal Property	
Replacement Tax (Page 89, 2000 Budget)	\$ 4,823,000.00
Reimbursement from Corporate Fund	
for Payroll and Indirect Costs	
(Page 89, 2000 Budget)	\$ 1,758,600.00
Revenue from Money and Property	
Investment Income and Misc.	
(Page 89, 2000 Budget)	\$ 5,500,000.00
Connection Impact Fees (Page 89, 2000 Budget)	<u>\$ 1,000,000.00</u>
Total Revenues Derived from	
Other Sources	\$ 57,653,000.00
Construction Fund	
Total Costs (from <u>Table 1B</u> on Page 4)	\$ 90,679,523.00
Ratio of Revenues vs. Construction Fund (\$57,653,000/\$90,679,523)	0.6358
Eligible Construction Fund as Furnished by Engineering Dept. (From <u>Table 1D</u> on Page 7)	\$ 26,801,500.00
Less Proportionate Share for Revenues (0.6358 x \$26,801,500)	\$ 17,040,086.00
Net Eligible Construction Fund	\$ 9,761,414.00
Net Eligible Portion of Construction Working Cash Fund = 0.879 x \$3,693,048 as explained on Pages 4 & 5 (Page 77, 2000 Budget)	\$ 3,247,544.00
OM&R Cost to be Recovered for Construction Fund	\$ 13,008,958.00

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 1D
2000 CONSTRUCTION FUND REPLACEMENT COST

PROJECT NUMBER	PROJECT TITLE/DESCRIPTION	ELIGIBLE APPROPRIATION	PERCENT ELIGIBLE TOTAL	IN-HOUSE COST
99-264-2S	Calumet WRP East Markham Force Main Rehab.	\$ 1,050,000	100	\$ 40,750
99-143-2M	Stickney WRP Replace Coarse Screens	\$ 3,060,000	100	\$ 190,000
99-268-2S	Kimberly Heights Outlet Sewer Replacement	\$ 700,000	100	\$ 59,500
96-116-2P	Stickney WRP Diffuser Replacement A&B	\$ 3,600,000	100	\$ 239,000
96-246-2P	Calumet WRP Diffuser Replacement A,B&C	\$ 4,500,000	100	\$ 206,000
97-089-2E	North Side WRP & NBPS Electrical Equip. Rehab.	\$ 4,500,000	100	\$ 161,000
99-001-2S	Niles Center Outlet Sewer Rehab. 2	\$ 1,518,000	100	\$ 58,750
99-XXX-2M	Hanover & Stickney WRPS Replace Two 35K Boilers	\$ 3,000,000	100	\$ 202,500
96-244-2M	Calumet WRP Misc. TARP Improvements	\$ 1,000,000	100	\$ 109,000
97-244-2E	Calumet WRP TARP RTU Replacement	\$ 2,500,000	100	\$ 107,000
TOTALS		\$25,428,000		\$1,373,500
TOTAL		\$26,801,500		

Source: Engineering Department memo dated June 19, 2000.

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 2

DETERMINATION OF TOTAL OM&R COST FOR 1999 AND 2000
ADJUSTED FOR REVENUES FROM OTHER SOURCES
AND FOR ADMINISTRATIVE COST

Revenue/Cost Item	For 2000 From 1999 Budget	For 2001 From 2000 Budget
Total OM&R Cost ¹	\$317,424,627	\$346,782,923
Less:		
Net Assets Appropriable ²	59,414,457	58,212,316
Revenue from Money and Property ²	11,200,000	10,100,000
Revenue from Current Services for Sewer Service Agreements, Water Sales and Scrap Sales	181,000	281,000
Revenue from Personal Property Replacement Tax ²	18,510,256	19,818,000
Reimbursement from Construction Fund ²	3,970,000	3,970,000
Revenue from Miscellaneous Sources (Does not include Fines) ^{2,3}	3,026,000	3,644,959
Connection Impact Fee ²	500,000	--
Administrative Cost ⁴	12,092,952	--
Administrative Costs to be Re- covered Through Charges Under the User Charge System ⁵	--	7,279,062
Subtotal of Revenues from Other Sources and Administrative Costs	108,894,665	103,305,337
Adjusted Total OM&R Cost	\$208,529,962	\$243,477,586
Rounded Off Figure	\$208,530,000	\$243,478,000

Sources: ¹From Table 1 on Page 2.²From Pages 81 and 82 of 1999 Budget and Pages 81 and 82 of 2000 Budget.³Does not include Fines which are to be recovered under Non-compliance Expenditures. See Table 3.⁴The total of costs from Pages 137 (4660, R&D), 196 (4660, Law) and 216 (7393, Finance) of the 2000 Budget.⁵From Table 3 on Page 10.

Determination of 2001 User Charge Administration Cost for Each User Charge Class

Table 3 presents the costs for administration of the User Charge system, which will be recovered by direct charges to Large Commercial-Industrial Users and by inclusion in the User Charge rates for other classes. The actual cost to be recovered in 2001 is \$7,279,062. This amount is subtracted from the total OM&R cost of \$250,756,648 resulting in a net OM&R cost of \$243,477,586 (rounded off \$243,478,000), which must be collected by the User Charge system.

Unit Costs of Treatment

District operating records indicate that 510,445 MG of flow, 936,294 Klbs of BOD, and 1,325,381 Klbs of SS were treated during 1999 (data from 1999 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 27.1725 percent of the cost is attributed to flow, 39.1699 percent to BOD, and 33.6576 percent to SS (from Finance Department Report CMSR02 dated January 26, 2000). 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 1998 total equalized assessed value (EAV) for its service area of \$76,750,000,000. This includes railroad property. Through a review and evaluation of all tax credits claimed by Large Commercial-Industrial and Tax-Exempt Users in 1999, based on their 1998 ad valorem property taxes, it was established that the EAV of the Large Commercial-Industrial sources was \$8,614,111,036. The EAV of Tax-Exempt Users was \$3,498,423. These are based on the most recently updated verified User data in the District's files and is for tax year 1998 payable in 1999. 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 (\$8,614,111,036) and the EAV of the Tax-Exempt Users (\$3,498,423) leaves a total EAV of \$68,132,390,541 for the Residential and Small Nonresidential Commercial-Industrial Users.

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 3

ADMINISTRATION COSTS
OF USER CHARGE AND SEWAGE AND WASTE CONTROL ORDINANCES
TO BE RECOVERED UNDER USER CHARGE SYSTEM

Small Commercial-Industrial Users ¹	\$ 61,548
Tax-Exempt Users	\$ 138,961
Large Commercial-Industrial Users	
User Charge Verification (UCV) Charges ¹	\$2,601,260
Minimum Pretreatment Requirement (MPR) Charges ²	\$2,246,878
Non-Compliance Expenditure (NCE) Charges ³	<u>\$2,230,415</u>
Total Administrative Costs to be Recovered from Users Under the User Charge Ordinance	\$7,279,062

¹Based on the memorandum dated June 8, 2000 from the District's Finance Department.

²See Table 15. This is an estimate based on the total of the Minimum Activity Expenditures and the Minimum Acceptable Sampling Expenditures.

³This is an estimated amount for 2001 and is based on the methodology that was utilized to compute the Extraordinary Monitoring and Enforcement charges for previous years, updated with the latest cost data.

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 4

UNIT COST OF TREATMENT

Total District Loadings for 1999*

Volume =	510,445 MG
BOD =	936,294 Klbs
SS =	1,325,381 Klbs

Total OM&R Cost = \$243,478,000

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

Flow =	27.173% x \$243,478,000	= \$66,159,060
BOD =	39.170% x \$243,478,000	= \$95,370,089
SS =	33.658% x \$243,478,000	= \$81,948,851

Unit Costs of Treatment

Volume =	\$ 66,159,060 / 510,445 MG	= \$ 129.61 / MG
BOD =	\$ 95,370,089 / 936,294 Klbs	= \$ 101.86 / Klbs
SS =	\$ 81,948,851 / 1,325,381 Klbs	= \$ 61.83 / Klbs

*The 1999 District loadings are used in the calculation of 2001 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 1999 Operating Records.)

**Percent distribution of cost-to-load parameters derived from the Finance Department CMSRO2 Report of January 26, 2000.

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 Com- mercial-Industrial	\$68,132,390,541**	289,113	286,933	405,082
Large Commercial- Industrial	\$ 8,614,111,036**	30,302	135,769	51,354
Tax-Exempt* (and Governmental)	\$ 3,498,423**	11,036	16,866	61,865
I/I, Rain and Recycle (Table 6)		179,994	496,726	807,080
Total (Approximate Due to Roundoff)	\$76,750,000,000***	510,445	936,294	1,325,381

*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 1999 annual statements filed by the Users. This data is verified by ad valorem tax bills submitted with the annual statements. \$38,246,653 in 1999 real estate taxes were claimed by Large Commercial-Industrial Users for 1999, and the District's 1998 tax rate was 44.4 cents per \$100 of EAV. Therefore, $\$38,246,653 / 0.444 \times \$100 = \$8,614,111,036$, the imputed EAV of the Large Commercial-Industrial Class. Similarly, Tax Exempt Users paid taxes of \$15,533 on certain parcels which were not exempt. Based on this tax paid, the EAV of the tax-exempt owned property was $\$15,533 / 0.444 \times \$100 = \$3,498,423$. 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 1998 as supplied by the County Assessor, Multiplier = 2.1799.

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 2001 calculations, the recycle flow volume was established as 35.65 MGD or 13,014 MG/year, based on an April 20, 2000 memorandum from the Maintenance and Operations Department providing the 1999 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 179,994 MG per year.

Analysis of Dry- and Wet-Weather Flows

The method of determining dry and wet-weather flows in the 2001 rate-setting process has been revised from the method used in the rate calculations for 2000 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.

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 6
ALLOCATION OF I/I, RAIN, AND RECYCLE

Class Loadings	Flow (MG)	%	BOD (Klbs)	%	SS (Klbs)	%
<u>Dry-Weather Loadings</u>						
Residential and Small Nonresidential Commercial-Industrial*	289,113	87.49	286,933	65.28	405,082	78.16
Large Commercial-Industrial†	30,302	9.17	135,769	30.89	51,354	9.91
Tax-Exempt (and Governmental)‡	11,036	3.34	16,866	3.84	61,865	11.94
TOTAL	330,451	100	439,568	100	518,301	100
<u>Allocating I/I, Rain And Recycle</u>						
Residential and Small Nonresidential Commercial-Industrial	157,478		324,244		630,779	
Large Commercial-Industrial*	16,505		153,423		79,967	
Tax-Exempt*	6,011		19,059		96,334	
TOTAL**	179,994		496,726		807,080	
GRAND TOTAL*** (Approximate; roundoff)	510,445		936,294		1,325,381	

*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 quantities were arrived at from the District's records of all 1999 User Charge Annual Certified Statements.

**Daily M&O Department records for the District's seven WRPs for the year 1999 show a total volume treated of 510,445 MG. The projected annual dry-weather volume is 941 x 365 days = 343,465 MG. I/I, Rain and Recycle flows are equal to Total Flow (510,445 MG) minus Dry-Weather Flow (343,465), or 166,980 MG plus Recycle (13,014 MG) = 179,994 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 1999 operating records as explained on page 11.

The month of January 1985 was chosen because it has these characteristics 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 and 2000 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 2000, the User Charge rate calculation utilized the average of the five lowest days for each of the last five years for which flow data was available to identify the average dry-weather flow. WRP flow data was available for 1994 through 1998 for the 2000 rate calculations. For each WRP the five lowest days for each year was averaged for each of the five available years.

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

For the 2001 rate calculations, it was determined to utilize the total of the seven consecutive lowest flow days recorded in 1999 at each of the District's WRPs for identifying the average daily dry weather flow. This method accounts for a complete normal workweek for each WRP along with weekends. Utilizing this method, the dry weather flow for 1999 is 941 MGD. The tabulation of this 1999 data is shown in Table 7.

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 7

LOWEST SEVEN CONSECUTIVE DAYS AVERAGE FLOW
AT WRPS FOR
1999

WRP	Million Gallons Per Day
Stickney	527.00
North Side	198.00
Calumet	167.00
Egan	19.30
Hanover	5.74
Kirie	22.86
Lemont	<u>1.40</u>
Total	941.00

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 243,678,536 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	\$184,246,019
Large Commercial-Industrial	43,643,329
Tax-Exempt	15,789,188
Total	\$243,678,536

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 68,132,390,541 for the Residential and Small Nonresidential Commercial-Industrial classes as shown in Table 5, and the class OM&R cost of 184,245,983 for the Residential and Small Nonresidential Commercial-Industrial classes, as shown in Table 8, the ad valorem residential OM&R rate for 2001 can be determined as follows:

$$\$184,245,983 / \$68,132,390,541 = 0.270 \text{ Per } \$100 \text{ EAV}$$

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 8

COST PER PARAMETER AND TOTAL COST PER USER CLASS FOR 2001 RATES

Class	Flow (MG)	BOD (Klbs)	SS (Klbs)	TOTAL
Residential and Small				
Nonresidential				
Commercial-Industrial	446,591	611,177	\$ 1,035,861	
UNIT COST	\$ 129.61	\$ 101.86	\$ 61.83	
COST	\$57,882,660	\$ 62,254,489	\$ 64,047,286	\$184,184,435
+ADMINISTRATION				
COST	\$ 19,354	\$ 20,815	\$ 21,415	\$ 61,548
CLASS TOTAL	\$57,902,014	\$ 62,275,304	\$ 64,068,701	\$184,245,983
Large Commercial-Industrial				
	46,807	289,192	131,321	
UNIT COST	\$ 129.61	\$ 101.86	\$ 61.83	
COST	\$ 6,066,655	\$ 29,457,097	\$ 8,119,577	\$ 43,643,329
CLASS TOTAL	\$ 6,066,655	\$ 29,457,097	\$ 8,119,577	\$ 43,643,329
Tax-Exempt				
(and Governmental)	17,047	35,925	158,199	
UNIT COST	\$ 129.61	\$ 101.86	\$ 61.83	
COST	\$ 2,209,462	\$ 3,659,321	\$ 9,781,444	\$ 15,650,227
+ADMINISTRATION				
COST	\$ 19,618	\$ 32,492	\$ 86,851	\$ 138,961
CLASS TOTAL	\$ 2,229,080	\$ 3,691,813	\$ 9,868,295	\$ 15,789,188
TOTAL COST				\$243,678,500

This constitutes the OM&R rate for all classes under the ad valorem tax system and represents 19.5 percent increase from the 2000 rate of 0.226/\$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 2000 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 0.270/\$100 EAV is without the allowance for uncollectibles. This rate adjusted by 2.5 percent for uncollectibles would be 0.264/\$100 EAV. The adjusted ad valorem OM&R rate is 59.5 percent ($0.264/0.444$) of the estimated total 1998 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:	\$ 6,066,655/30,302	MG	=	\$200.21/MG
BOD:	\$29,457,097/135,769	Klbs	=	\$216.96/Klbs
SS:	\$ 8,119,577/51,354	Klbs	=	\$158.11/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:	\$ 2,229,080/11,036	MG	=	\$201.98/MG
BOD:	\$ 3,691,813/16,866	Klbs	=	\$218.89/Klbs
SS:	\$ 9,868,295/61,865	Klbs	=	\$159.51/Klbs

The proposed 2001 rates compare with current 2000 rates as follows:

<u>Class Parameters</u>	<u>2001</u>	<u>2000</u>	<u>% Change</u>
Large Commercial-Industrial			
Flow \$/MG	\$200.21	\$215.09	-6.92
BOD \$/Klbs	\$216.96	\$205.33	+5.66
SS \$/Klbs	\$158.11	\$163.43	-3.26

<u>Class Parameters</u>	<u>2001</u>	<u>2000</u>	<u>% Change</u>
Tax-Exempt			
Flow \$/MG	\$201.98	\$181.83	+11.08
BOD \$/Klbs	\$218.89	\$173.52	+26.15
SS \$/Klbs	\$159.51	\$138.14	+15.47
OM&R Factor	0.595	0.488	+21.93

2001 USER CHARGE ADMINISTRATIVE COST RECOVERY PROGRAM

LARGE COMMERCIAL INDUSTRIAL USER CLASS

1999 PRETREATMENT PROGRAM EXPENDITURES

Industrial User Category Definitions

Each Large Commercial Industrial User within the District's jurisdiction falls under one of the following category definitions.

1. **Categorical Significant Industrial Users (SIUs):** Industrial Users (IUs) subject to categorical pretreatment standards. Industrial categories regulated under categorical pretreatment standards are listed in Table 9.
2. **Non-Categorical SIUs:** IUs that are significant, as defined by the District's Sewage and Waste Control Ordinance (Ordinance), but are not regulated by categorical pretreatment standards.
3. **Non-SIUs:** IUs that are not significant 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.

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 9

INDUSTRIAL CATEGORIES REGULATED FOR
CATEGORICAL PRETREATMENT STANDARDS IN 1999

Category Description	Code of Federal Regulations Part Number
Textile Mills	40 CFR 410
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
Steam Electric Power Generating	40 CFR 423
Leather Tanning & Finishing	40 CFR 425
Rubber Processing	40 CFR 428
Timber Products Processing	40 CFR 429
Pulp, Paper & Paperboard	40 CFR 430
Builders' Paper & Board Mills	40 CFR 431
Metal Finishing	40 CFR 433
Pharmaceutical Manufacturing	40 CFR 439
Pesticides	40 CFR 455
Battery Manufacturing	40 CFR 461
Plastics Molding & Forming	40 CFR 463
Metal Molding & Casting	40 CFR 464
Porcelain Enameling	40 CFR 466
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

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 in Table 10. Tables 11 through 14 are summarized as follows:

User Category	MAAU	EAU	Total AUs
Categorical SIUs	3,260.25	673.75	3,934.00
Non-Categorical SIUs	1,899.50	300.75	2,200.25
Non-SIUs	387.00	144.50	531.50
Totals:	5,546.75	1,119.00	6,665.75

Converting these values into percentages of total AUs pinpoints the relative amount of activity for each IU category, as follows:

User Category	MAAU	EAU	Total AUs
Categorical SIUs	48.91%	10.11%	59.02%
Non-Categorical SIUs	28.50%	4.51%	33.01%
Non-SIUs	5.80%	2.17%	7.97%
Totals:	83.21%	16.79%	100.00%

By applying these percentages to the Enforcement Section's portion of the total 1999 Pretreatment Program expenditures, the following costs attributed to each of the three IU categories have been determined.

Minimal Acceptable Activity Expenditures:

User Category	Percent of Total AUs	Expenditures
Categorical SIUs	48.91%	\$1,110,409.63
Non-Categorical SIUs	28.50%	647,038.93
Non-SIUs	5.80%	131,678.10
		\$1,889,126.66

Non-SIUs are not subject to any minimum pretreatment requirement. The \$131,678.10 in Minimal Acceptable Activity Expenditures attributed to Non-SIUs was incurred by these IUs prior to reclassification from SIU to Non-SIU status. Therefore, these costs have been returned to the Categorical SIU category where they more accurately reflect the user group that incurred said costs.

Minimal Acceptable Activity Expenditures (Adjusted):

User Category	Percent of Total AUs	Expenditures
Categorical SIUs	54.71%	\$1,242,087.73
Non-Categorical SIUs	28.50%	647,038.93
Non-SIUs	0.00%	0.00
		\$1,889,126.66

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 10

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

Activity Type	Activity Description
Minimal Acceptable Activity	Review and Processing of Discharge Authorization Requests
Minimal Acceptable Activity	Review and Processing of Continued Compliance Reports (RD-115s)
Minimal Acceptable Activity	Review and Processing of Spill Prevention, Control and Counter-measure Plans
Minimal Acceptable Activity	Review and Processing of Industrial Waste Generation & Disposal Reports (RD-300s)
Extraordinary Activity	Notices of Noncompliance
Extraordinary Activity	Cease and Desist Orders
Extraordinary Activity	Show Cause Recommendations
Extraordinary Activity	Legal Action Recommendations
Extraordinary Activity	Referrals to the Law Department
Extraordinary Activity	Amendments to Enforcement Actions
Extraordinary Activity	Compliance Date Revisions
Extraordinary Activity	Compliance Meeting Notifications
Extraordinary Activity	Delinquent Report Notifications
Extraordinary Activity	Rescinding of Enforcement Actions
Extraordinary Activity	Acceptable Report Notifications
Extraordinary Activity	Enforcement Action Correspondence
Extraordinary Activity	Meeting or Hearing
Extraordinary Activity	Compliance Schedule Review
Extraordinary Activity	Statement of Compliance Review

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 11

1999 PRETREATMENT PROGRAM COST RECOVERY
MINIMAL ACCEPTABLE ACTIVITY UNITS

Categorical SIUs

<u>Activity</u>	<u>Number</u>	<u>Unit Effort</u>	<u>Activity Units</u>
DARs	128	7.00	896.00
RD-115s	703	3.00	2,109.00
SPCCs	21	7.00	147.00
IWGDs	433	0.25	108.25
			<u>3,260.25</u>

Non-Categorical SIUs

<u>Activity</u>	<u>Number</u>	<u>Unit Effort</u>	<u>Activity Units</u>
DARs	115	7.00	805.00
RD-115s	333	3.00	999.00
SPCCs	9	7.00	63.00
IWGDs	130	0.25	32.50
			<u>1,899.50</u>

Non-SIUs

<u>Activity</u>	<u>Number</u>	<u>Unit Effort</u>	<u>Activity Units</u>
DARs	35	7.00	245.00
RD-115s	1	3.00	3.00
SPCCs	7	7.00	49.00
IWGDs	360	0.25	90.00
			<u>387.00</u>

Total Minimal Acceptable Activity Units: 5,546.75

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 12

1999 PRETREATMENT PROGRAM COST RECOVERY
EXTRAORDINARY ACTIVITY UNITS - EFFLUENT METALS NONCOMPLIANCE

Categorical SIUs

<u>Activity</u>	<u>Number</u>	<u>Unit Effort</u>	<u>Activity Units</u>
Cease & Desist Orders	72	0.75	54.00
Show Cause Recommendation	4	5.00	20.00
Referral to Law	38	2.00	76.00
Amendment	177	0.75	132.75
Notice of Noncompliance	84	0.50	42.00
Compliance Date Revision	4	0.50	2.00
Ten Day Letter	6	0.50	3.00
Notification Letter	3	1.00	3.00
Meeting of Hearing	1	2.00	2.00
Compliance Schedule	1	1.00	1.00
Statement of Compliance	98	0.50	49.00
			<u>384.75</u>

Non-Categorical SIUs

<u>Activity</u>	<u>Number</u>	<u>Unit Effort</u>	<u>Activity Units</u>
Cease & Desist Orders	14	0.75	10.50
Amendment	38	0.75	28.50
Notice of Noncompliance	29	0.50	14.50
Compliance Date Revision	1	0.50	0.50
Notification Letter	1	1.00	1.00
Statement of Compliance	28	0.50	14.00
			<u>69.00</u>

Non-SIUs

<u>Activity</u>	<u>Number</u>	<u>Unit Effort</u>	<u>Activity Units</u>
Cease & Desist Orders	13	0.75	9.75
Referral to Law	2	2.00	4.00
Amendment	12	0.75	9.00
Notice of Noncompliance	10	0.50	5.00
Notification Letter	2	1.00	2.00
Meeting or Hearing	2	2.00	4.00
Statement of Compliance	14	0.50	7.00
			<u>40.75</u>

Total Extraordinary Activity Units
For Effluent Metals Noncompliance:

494.50

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 13

1999 PRETREATMENT PROGRAM COST RECOVERY
EXTRAORDINARY ACTIVITY UNITS - REPORTING NONCOMPLIANCE

Categorical SIUs

<u>Activity</u>	<u>Number</u>	<u>Unit Effort</u>	<u>Activity Units</u>
Cease & Desist Orders	70	0.75	52.50
Referral to Law	9	2.00	18.00
Amendment	3	0.75	2.25
Notice of Noncompliance	4	0.50	2.00
Compliance Date Revision	6	0.50	3.00
Acceptable Report Notification	1	0.50	0.50
Ten Day Letter	16	0.50	8.00
Notification Letter	58	1.00	58.00
Enforcement Action Rescinded	2	0.50	1.00
Meeting or Hearing	8	2.00	16.00
Notification Letter	2	1.00	2.00
Compliance Schedule	16	1.00	16.00
Statement of Compliance	64	0.50	32.00
			<u>211.25</u>

Non-Categorical SIUs

<u>Activity</u>	<u>Number</u>	<u>Unit Effort</u>	<u>Activity Units</u>
Cease & Desist Orders	44	0.75	33.00
Referral to Law	2	2.00	4.00
Notice of Noncompliance	6	0.50	3.00
Compliance Date Revision	2	0.50	1.00
Ten Day Letter	17	0.50	8.50
Acceptable Report Notification	1	0.50	0.50
Enforcement Action Rescinded	2	0.50	1.00
Notification Letter	38	1.00	38.00
Meeting or Hearing	6	2.00	12.00
Compliance Schedule	2	1.00	2.00
Statement of Compliance	38	0.50	19.00
			<u>122.00</u>

Non-SIUs

<u>Activity</u>	<u>Number</u>	<u>Unit Effort</u>	<u>Activity Units</u>
Cease & Desist Orders	9	0.75	6.75
Compliance Date Revision	2	0.50	1.00
Ten Day Letter	5	0.50	2.50
Acceptable Report Notification	1	0.50	0.50
Notification Letter	32	1.00	32.00
Meeting or Hearing	1	2.00	2.00
Compliance Schedule Review	2	1.00	2.00
Statement of Compliance	19	0.50	9.50
			<u>56.25</u>

Total Extraordinary Activity Units
For Reporting Noncompliance:

389.50

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 14

1999 PRETREATMENT PROGRAM COST RECOVERY
EXTRAORDINARY ACTIVITY UNITS - EFFLUENT NON-METALS NONCOMPLIANCE

Categorical SIUs

<u>Activity</u>	<u>Number</u>	<u>Unit Effort</u>	<u>Activity Units</u>
Cease & Desist Orders	21	0.75	15.75
Referral to Law	5	2.00	10.00
Amendment	24	0.75	18.00
Notice of Noncompliance	29	0.50	14.50
Notification Letter	1	1.00	1.00
Meeting or Hearing	2	2.00	4.00
Statement of Compliance	29	0.50	14.50
			<u>77.75</u>

Non-Categorical SIUs

<u>Activity</u>	<u>Number</u>	<u>Unit Effort</u>	<u>Activity Units</u>
Cease & Desist Orders	23	0.75	17.25
Amendment	42	0.75	31.50
Notice of Noncompliance	68	0.50	34.00
Compliance Date Revision	1	0.50	0.50
Ten Day Letter	2	0.50	1.00
Compliance Schedule Review	3	1.00	3.00
Statement of Compliance	45	0.50	22.50
			<u>109.75</u>

Non-SIUs

<u>Activity</u>	<u>Number</u>	<u>Unit Effort</u>	<u>Activity Units</u>
Cease & Desist Orders	23	0.75	17.25
Amendment	5	0.75	3.75
Notice of Noncompliance	12	0.50	6.00
Compliance Date Revision	3	0.50	1.50
Acceptable Report Notification	2	0.50	1.00
Notification Letter	4	1.00	4.00
Statement of Compliance	28	0.50	14.00
			<u>47.50</u>

Total Extraordinary Activity Units For
Effluent Non-Metals Noncompliance:

235.00

Extraordinary Activity Expenditures:

User Category	Percent of Total AUs	Expenditures
Categorical SIUs	10.11%	\$229,528.55
Non-Categorical SIUs	4.51%	102,391.07
Non-SIUs	2.17%	49,265.77
		<u>\$381,185.39</u>

Sampling Activities

In regards to Field Surveillance Section activities, a total of 41,581 samples were collected during 1999. Of that total, 33,910 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 $((A+C)\times 4)$
Categorical SIUs	483	80	2,252
Non-Categorical SIUs	210	0	840
Non-SIUs	0	0	0
Totals:	693	80	3,092

Since all 1999 Field Surveillance Section sampling activities beyond MASA were extraordinary sampling events, the ESAs are the difference between the total number of samples collected and the MASA. ESAs are summarized as follows:

User Category	MASA	ESA	Total Samples
Categorical SIUs	2,252	15,814	18,066
Non-Categorical SIUs	840	7,783	8,623
Non-SIUs	0	7,221	7,221
Totals:	3,092	30,818	33,910

Converting these values into percentages of the total 1999 sampling activity illustrates the following relative amount of sampling activity for each IU category.

User Category	MASA	ESA	Total SAS
Categorical SIUs	6.64%	46.63%	53.27%
Non-Categorical SIUs	2.48%	22.95%	25.43%
Non-SIUs	0.00%	21.30%	21.30%
Totals:	9.12%	90.88%	100.00%

By applying these percentages to the total 1999 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 three IU categories have been determined.

Minimal Acceptable Sampling Activity Expenditures:

User Category	Percent of Total SAs	Expenditures
Categorical SIUs	6.64%	\$261,788.36
Non-Categorical SIUs	2.48%	97,776.38
Non-SIUs	0.00%	0.00
		\$359,564.74

Extraordinary Sampling Activity Expenditures:

User Category	Percent of Total SAs	Expenditures
Categorical SIUs	46.63%	\$1,838,432.42
Non-Categorical SIUs	22.95%	904,825.74
Non-SIUs	21.30%	839,772.90
		\$3,583,031.06

Legal Activities

The remaining 1999 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 1999 expenditures attributed to each of the three IU categories are summarized as follows:

User Category	ELA	Percentage of Total ELAs	Expenditures
Categorical SIUs	56	93.33%	\$205,177.86
Non-Categorical SIUs	2	3.33%	7,327.78
Non-SIUs	2	3.33%	7,327.78
Totals:	60	100.00%	\$219,833.42

1999 Pretreatment Program Cost Distribution

Table 15 summarizes minimal and extraordinary expenditures and quantifies 1999 total expenditures under Program 4662. Table 16 identifies 1999 Departmental expenditures under Program 4662.

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 15

PROGRAM 4662 - SEWAGE AND WASTE CONTROL
EXPENDITURES FOR 1999 BY USER CATEGORY

User Category	MAAE	EAE	MASE	ESE	ELE	Expenditures Per User Category
Categorical SIUs	\$1,242,087.73	\$229,528.55	\$261,788.36	\$1,838,432.42	\$205,177.86	\$3,777,014.92
Non-Categorical SIUs	647,038.93	102,391.07	97,776.38	904,825.74	7,327.78	1,759,359.90
Non-SIUs	0.00	49,265.77	0.00	839,772.90	7,327.78	896,366.45
Totals:	\$1,889,126.66	\$381,185.39	\$359,564.74	\$3,583,031.06	\$219,833.42	\$6,432,741.27

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 1999

Dept	Division	Section	Section Number	1998 Expenditures
R&D	Environmental Monitoring & Research	Administrative	121	\$37,878.97
R&D	Environmental Monitoring & Research	Wastewater Treatment Research	122	36,739.24
R&D	Environmental Monitoring & Research	Land Reclamation and Soil Science-Stickney	123	27.55
R&D	Environmental Monitoring & Research	Biology-Stickney	124	29,432.85
R&D	Environmental Monitoring & Research	Toxic Substances	127	106,596.27
R&D	Analytical Laboratories	Administrative	161	73,725.15
R&D	Analytical Laboratories	Stickney Analytical Laboratory	162	156,854.38
R&D	Analytical Laboratories	Industrial Waste Analytical Laboratory	164	458,710.52
R&D	Analytical Laboratories	Egan Analytical Laboratory	166	3,291.68
R&D	Analytical Laboratories	Calumet Analytical Laboratory	167	0.00
R&D	Industrial Waste	Administrative	191	192,033.38
R&D	Industrial Waste	Enforcement	192	2,078,278.67
R&D	Industrial Waste	Field Surveillance-Stickney	194	1,414,065.83
R&D	Industrial Waste	Field Surveillance-Calumet	195	399,463.24
R&D	Industrial Waste	Field Surveillance-North Side	196	585,757.95

METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 16

PROGRAM 4662 - SEWAGE AND WASTE CONTROL
 DEPARTMENTAL EXPENDITURES FOR 1999
 (continued)

Dept	Division	Section	Section Number	1998 Expenditures
R&D	Industrial Waste	Field Surveillance-Kirie	197	640,052.17
Law	Executive	Executive Office	311	35,204.44
Law	Executive	Clerical Section	312	0.00
Law	General Litigation	Litigation	332	1,031.60
Law	Appeals, Claims & Environmental	Administrative	361	50,728.10
Law	Appeals, Claims & Environmental	Industrial Waste	362	132,869.28

1999 TOTAL EXPENDITURES UNDER PROGRAM 4662: **\$6,432,741.27**

TOTAL EXPENDITURES UNDER PROGRAM 4662						
1993	1994	1995	1996	1997	1998	1999
\$7,061,571.91	\$7,018,700.60	\$6,282,000.92	\$6,708,839.83	\$6,246,708.54	\$6,086,474.07	\$6,432,741.27

2001 USER CHARGE ADMINISTRATIVE COST ASSESSMENT

Identification of Large Commercial-Industrial Users (LCIUs)

Users subject to the 2001 User Charge Administrative Cost Recovery Program are initially identified by the District's December 31, 1999, listing of LCIUs. This preliminary listing is then reviewed and Users 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 has been reclassified because it no longer performs operations that originally resulted in a LCIU classification status.
4. The company has been sold to a new business entity.

The District has identified 1,039 LCIUs subject to the 2001 Administrative Cost Recovery Program. These Users are listed in Table 17.

User Charge Administrative Cost Recovery Activities

The District incurs administrative costs through federally mandated operation and management of its Pretreatment and User Charge Programs. Administrative costs attributed to LCIUs are recovered through assessment of the following charges.

1. Minimum Pretreatment Requirement (MPR) Charge: A charge incurred by SIUs to recover the costs for administering the minimum pretreatment requirements as contained in the Code of Federal Regulations and the Sewage and Waste Control Ordinance.
2. User Charge Verification (UCV) Charge: A charge incurred by all LCIUs to recover the cost of administering the verification requirements in the User Charge Ordinance.
3. Noncompliance Enforcement (NCE) Charge: A charge incurred by Users to recover the cost of additional monitoring and enforcement activities to resolve User noncompliance with effluent limitations found in the Sewage and Waste Control Ordinance.

Minimum Pretreatment Requirement (MPR) Charge

The MPR Charge is applicable to all SIUs for annual account administration under the District's Pretreatment Program. Each SIU's MPR charge is based on the following Pretreatment Program activities.

1. Mandatory Report Review.
2. Annual facility inspection and review.
3. Annual facility sampling and review.
4. Annual sampling analysis.

MANDATORY REPORT REVIEW (MRR) UNIT COST

The time required for MRR is related to the annual volume of effluent discharged from each SIU. Therefore, the MRR charge is based on the most recent annual UC verified flow data; i.e., 1999 annual UC verified flow applicable to 2001 MRR charges. If UC verified flow is not available, the best alternative data is used. This may include User self-reported data as found in Continued Compliance Reports, form RD-115.

After SIU annual flows have been determined, individual MRR charges are computed as follows:

1. Rank SIUs in order of decreasing flow.
2. Divide listing into eight equal tiers.
3. Set Tier 8 (bottom Tier) charge equal to \$500.00.
4. Subtract Tier 8 total charges from total MAAE costs (Table 15). The remainder is 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 SIUs 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 percent of the average payment.
8. Set Tier 2 equal to 150 percent of the average payment.
9. Set Tier 3 equal to 125 percent of the average payment.

10. Set Tier 5 equal to 75 percent of the average payment.
11. Set Tier 6 equal to 50 percent of the average payment.
12. Set Tier 7 equal to 25 percent of the average payment.
13. The resulting tier charges are then rounded to whole dollars.

For 2001, there are 513 SIUs subject to MRR charges. Individual and total MRR charges per tier are as follows:

Tier	Annual Flow (GPY)	MRR Charge per SIU	Number of SIUs/Tier	Total
1	>56,498,000	\$7,220	65	\$469,300
2	56,498,000 to 28,329,770	\$6,120	64	391,680
3	28,329,769 to 18,613,980	\$5,160	64	330,240
4	18,613,979 to 10,464,520	\$4,130	64	264,320
5	10,464,519 to 6,036,040	\$3,090	64	197,760
6	6,036,039 to 3,478,200	\$2,060	64	131,840
7	3,478,199 to 1,296,760	\$1,030	64	65,920
8	<1,296,760	\$500	64	32,000
		TOTAL:	513	\$1,883,060

Details concerning each SIU's MRR charge may be found in Table 17.

ANNUAL INSPECTION, SAMPLING AND ANALYSIS UNIT COSTS

The Minimal Acceptable Sampling Expenditures (MASE) for 1999 (Table 15) equaled \$359,564.74. This expenditure identifies the total cost incurred by the District in 1999 to satisfy minimum regulatory requirements for inspection, sampling and analysis under the District's Pretreatment Program. Estimated 1999 unit costs for each of these activities are as follows:

Minimum Pretreatment Requirement	1999 Unit Cost
Inspection and Review	\$200 per Inspection
Sampling and Review	\$27.50 per outlet visit
Sample Analysis	
Never sampled for Total Toxic Organics (TTOs)	\$100 per outlet per sample program
TTOs sampled once per 4 yrs.	\$400 per outlet per sample program
TTOs sampled annually	\$1,300 per outlet per sample program

As previously stated, the MPR charge is the sum of the costs incurred by the District for performing the following mandated Pretreatment Program activities:

1. SIU Account Administration and Mandatory Report Reviews.
2. Annual SIU Pretreatment Inspection.
3. Annual SIU Pretreatment Sampling.
4. Annual SIU Pretreatment Sample Analysis.

As an example, an SIU with one sanitary sewer outlet and a discharge equal to nine million gallons per year would be assessed the following charges depending on which of the listed four-day Pretreatment Sampling Programs was required:

	Pretreatment Sample Program		
	No TTOs	One TTO per 4 yrs.	TTOs Annually
Mandatory Report Review	\$3,090	\$3,090	\$3,090
Inspection & Review	200	200	200
Sampling & Review (per outlet)	110	110	110
Sample Analysis (per outlet)	100	400	1,300
Total:	\$3,500	\$3,800	\$4,700

User Charge Verification (UCV) Charge

Based on the Finance Department's memorandum dated June 8, 2000, the cost to administer the User Charge Ordinance in 1999, as it is assigned to Program 4663, was \$3,826,178.00. A breakdown of these costs is provided below.

User Charge Section	
Industrial Waste Division	\$1,043,756
Field Surveillance Section	
Industrial Waste Division	\$1,611,643
R&D Laboratory	\$731,205
Finance Department	\$114,141
Law Department	\$325,433
TOTAL:	\$3,826,178

The above administrative costs will be recovered from the following User Classes:

1. Residential and Small Nonresidential Commercial-Industrial Users (RSNCUs).
2. Large Commercial-Industrial Users (LCUs).
3. Tax-Exempt Users (TEUs).

The recovery of administrative costs for RSNCUs and TEUs will be via the rates for flow, BOD and SS as in 2000. For LCUs, a portion of the cost to administer the User Charge Ordinance will be recovered through the User Charge Verification (UCV) Charge. The UCV Charge is applicable to LCUs only. The UCV Charge has two components namely, sampling charge and report review charge. A further distinction is made in the LCU class namely, LCUs who pay an annual Net User Charge (NUC) less than \$4,800 (these Users are called the Annual Payers) and LCUs who pay an annual NUC greater than \$4,800 (these Users are called Monthly Payers). Based on the best available records for 1999, there were 1,039 LCUs of which 645 are Annual Payers and 394 are Monthly Payers.

DISTRIBUTION OF USER CHARGE ADMINISTRATION COST AMONG USER CATEGORIES

The User Charge Administrative Cost of \$3,826,178 is recovered through 2001 User Charge rates in the following manner:

1. Administration cost assigned to RSNCU Class	\$61,548
2. Administration cost assigned to TEU Class	\$138,961
3. UCV Charges assigned to LCU Class:	
a. As Report Review Charge	\$1,363,440
b. As Sampling Charge	\$1,176,200
4. Discretionary Cost recovered from all User classes	<u>\$1,086,029</u>
	TOTAL: \$3,826,178

ACTIVITIES RELATED TO UCV CHARGES

The activities performed in the User Charge Section (UCS) downtown office, the Finance Department, and the Law Department determine the report review charge portion of the UCV Charge. Ninety-two percent of the time spent by the UCS, the Finance Department, and the Law Department is toward the review of LCU accounts. Since these activities determine the report review charge, the administrative cost that can be assigned to report review of the LCUs is as follows:

1. Report review cost from UCS = $0.92 \times \$1,043,756.00$
= \$960,256.00
 2. Report review cost from Finance = $0.92 \times \$114,141.00$
= \$105,010.00
 3. Report review cost from Law Department
= $0.92 \times \$325,433.00$
= \$299,398.00
- Total cost to review LCU reports = \$1,364,664.00

Of this amount, \$112,964.00 is dedicated to the review of Field Reports. This leaves a balance of \$1,251,700.00. Of this 60 percent, or \$751,020.00 is assigned to the review of reports from Monthly Payers, and 40 percent, or \$500,680.00 is assigned to the review of reports from Annual Payers. Distributing these costs among 394 Monthly Payers, and 645 Annual Payers provides the report review charge for these categories:

1. Report review charge for Annual Payer = $\$500,680 \div 645$
= \$776.25, or say
= \$780.00 per User
2. Report review charge for Monthly Payer = $\$751,020 \div 394$
= \$1,906, or say
= \$1,900 per User

However, in the case of Monthly Payers, additional charge for the review of Field Reports that correspond to the sampling event(s) need to be included to the report review cost depending upon the range of NUC owed by a User. These additional charges are determined to be \$50.00 in the case of Users in the NUC range of \$4,800 to \$47,999 (which call for the review of one Field Report); \$440 for Users in the NUC range of \$48,000 to \$99,999 (which call for the review of two Field Reports); and \$1,220 for Users in the NUC range of \$100,000 to greater than \$1 million (which call for a review of three or more Field Reports).

The report review cost portion of the UCV Charge to be recovered in 2001 can be summarized in the following table:

REPORT REVIEW COST

<u>Verification Category</u>	<u>No. of Users</u>	<u>Report Review Charge</u>	<u>Report Review Cost</u>
LCIU with NUC < \$4,800	645	\$780	\$503,100
LCIU WITH NUC > \$4,800, < \$9,999	110	\$1,950	\$214,500
LCIU WITH NUC > \$10,000, < \$47,999	178	\$1,950	\$347,100
LCIU WITH NUC > \$48,000, < \$99,999	41	\$2,340	\$95,940
LCIU WITH NUC > \$100,000, < \$499,999	58	\$3,120	\$180,960
LCIU WITH NUC > \$500,000, < \$999,999	5	\$3,120	\$15,600
LCIU WITH NUC > \$1,000,000	<u>2</u>	\$3,120	<u>\$6,240</u>
Totals:	1,039		\$1,363,440

The activities performed by the Field Surveillance Section, and the R&D Laboratory will determine the sampling charge portion of the UCV Charge. The total User Charge administrative cost applicable to the activities of Field Surveillance Section, Industrial Waste Division, and R&D Laboratory is \$2,342,848.00. This expenditure identifies the total cost incurred by the District in 1999 toward inspection, sampling and analysis under the User Charge Program. For 1999, approximately 11,714 general chemistry samples were collected and analyzed, which translates to \$200 per sample for collection and analysis. This was used as the basis to determine sampling charge for the level of sample activity assigned to each User based on the range of NUC owed by these Users. Of the total sampling cost of \$2,342,848.00, an amount of \$1,176,200 is being recovered from LCU class, and is summarized in the following table. The balance of \$1,166,648 is recovered as a combination of discretionary cost, and partial administration cost of RSNCU and TEU classes.

<u>Verification Category</u>	<u>Sampling Charge Per Outlet</u>	<u>No. of Users</u>	<u>Total Sampling Cost</u>
1. LCIU with NUC > \$4,800 but < \$9,999:			
a. Users with One Outlet	\$800	73	\$58,400
b. Users with Two Outlets	\$800	16	\$25,600
c. Users with Three Outlets	\$800	5	\$12,000
d. Users with Four Outlets	\$800	1	\$3,200
e. Users with Five Outlets	\$800	1	\$4,000
f. Users with Six Outlets	\$800	1	\$4,800
g. Users with Seven Outlets	\$800	1	\$5,600
2. LCIU with NUC > \$10,000 but < \$47,999:			
a. Users with One Outlet	\$1,400	118	\$165,200
b. Users with Two Outlets	\$1,400	34	\$95,200
c. Users with Three Outlets	\$1,400	14	\$58,800
d. Users with Four Outlets	\$1,400	4	\$22,400
e. Users with Five Outlets	\$1,400	2	\$14,000
f. Users with Six Outlets	\$1,400	1	\$8,400
g. Users with Seven Outlets	\$1,400	1	\$9,800
3. LCIU with NUC > \$48,000 but < \$99,999:			
a. Users with One Outlet	\$2,800	28	\$78,400
b. Users with Two Outlets	\$2,800	9	\$50,400
c. Users with Three Outlets	\$2,800	3	\$25,200

<u>Verification Category</u>	<u>Sampling Charge Per Outlet</u>	<u>No. of Users</u>	<u>Total Sampling Cost</u>
4. LCIU with NUC > \$100,000 but < \$499,999:			
a. Users with One Outlet	\$5,600	40	\$224,000
b. Users with Two Outlets	\$5,600	10	\$112,000
c. Users with Three Outlets	\$5,600	4	\$67,200
d. Users with Four Outlets	\$5,600	1	\$22,400
e. Users with Five Outlets	\$5,600	1	\$28,000
5. LCIU with NUC > \$500,000 but < \$999,999:			
a. Users with One Outlet	\$8,400	5	\$42,000
b. Users with Two Outlets	\$8,400	1	\$16,800
6. LCIU with NUC > \$1,000,000:			
a. Users with One Outlet	\$11,200	0	\$0
b. Users with Two Outlets	\$11,200	1	\$22,400
		Total:	\$1,176,200

Noncompliance Enforcement (NCE) Charge

Finally, the NCE charge is a charge imposed on Users by the District to recover the cost of additional sampling and administrative activities. These activities, as listed in Table 10, are a mandatory requirement of the District's pretreatment program for resolution of User noncompliance with effluent limitations found in the Sewage and Waste Control Ordinance.

Table 15 notes that the District's 1999 Total Extraordinary Sampling Expenditure (ESE) equaled approximately \$3.5 million. Page 29 of this report indicates that 30,818 Extraordinary Sampling Activities (ESA) were performed during 1999. An estimated daily NCE sampling charge of approximately \$115 was computed by dividing the ESE by the ESA. For any given level of enforcement action, the daily NCE sampling charge is multiplied by the mandated sampling duration to compute the total sampling charge. For example, a Notice of Non-Compliance with a mandated sample duration of four days times a daily NCE sampling charge of \$115 per day equals a total sampling charge of \$460.

Similarly, Table 15 notes that the District's 1999 Total Extraordinary Activity Expenditure (EAE) equaled \$381,185. For 1999, District records indicate that 706 enforcement actions were taken for effluent limit violations. These actions include Notices of Non-Compliance, Cease and Desist Orders (C&Ds) and amendments to C&Ds. An NCE administrative charge of \$540 was computed by dividing the EAE by 706 enforcement actions.

A schedule of 2001 NCE charges (found under Appendix F, Section 2 of the User Charge Ordinance) is as follows.

Enforcement Level	Sampling Duration	Sampling Charge	Administrative Charge
Notice of Non-Compliance	1 week (4 sample days)	\$460	\$540
C&D Single-sample Significant Non-Compliance (SNC)	2 weeks (9 sample days)	\$1,040	\$540
C&D (Chronic/Accute SNC)	1 month (23 sample days)	\$2,670	\$540
C&D (Recurring)	Continuous until 30 days beyond compliance date of last action	\$1,040 per C&D	\$540 per C&D
Show Cause Action/ Legal Action	Continuous until 30 days beyond Compliance date	*	*

*To be addressed in resolution of enforcement action.

2001 User Charge Administrative Cost Recovery Phase-In

For the year 2000, the total administrative cost to be recovered from the Large Commercial Industrial User (LCIU) class by the User Charge system was determined to be \$7,603,150. This amount was included in and recovered by the 2000 rates for flow, BOD and suspended solids that was used to compute the gross User Charge incurred by each LCIU.

To reduce the adverse impact of any additional charges under the User Charge Administrative Cost Recovery Program, affected LCIs will be provided a three-year phase-in for total recovery of their respective MPR and UCV charges. For 2001, a 66 percent discount on any increase over the combined 2000 administrative cost recovery portion of the gross User Charge and Extraordinary Monitoring and Enforcement Charge will be provided. For 2002, a

33 percent discount will be provided over the 2000 amount. Starting in 2003, full payment of assessed MPR and UCV charges will be required. Table 17 identifies LCIU discounts where applicable.

2001 USER CHARGE RATES AND
ADMINISTRATIVE COST RECOVERY PROGRAM

PREPARATION AND REVIEW DECLARATIONS

The 2001 User Charge Rates and User Charge Administrative Cost Recovery Program charges described on pages 1 through 20 of this report were prepared by:

Signature on file

Date: 2/22/2001

Donald Byron
Senior Environmental Engineer

The 1999 Pretreatment Program Expenditures and 2001 User Charge Administrative Cost Recovery Program charges described on pages 21 through 61 of this report were prepared by:

Signature on file

Date: 2/22/01

Timothy F. Moscinski
Pollution Control Officer III

The 2001 User Charge Rates and Administrative Cost Recovery Program charges described on pages 1 through 61 of this report were reviewed for content and accuracy and prepared under the direction of:

Signature on file

Date: 2/22/01

Richard C. Sustich
Assistant Director
Research and Development
Industrial Waste Division

**2001 USER CHARGE ADMINISTRATIVE COST RECOVERY
CHARGE LISTING**

