



REGION 8

DENVER, CO 80202

Ref: 8WD-CWW

SENT VIA EMAIL
DIGITAL READ RECEIPT REQUESTED

Jennifer Robinette
Director of Environmental Services
Metro Water Recovery
jrobinett@metrowaterrecovery.com

Re: EPA Pretreatment Audit, National Pollutant Discharge Elimination System Permit
Numbers CO-0026638 and CO-0048959

Dear Ms. Robinette:

The U.S. Environmental Protection Agency (EPA) conducted an audit of the Pretreatment program administered by the Metro Water Recovery (MWR) from April 15, 2024, to April 29, 2024.

The intent of a Pretreatment audit is to evaluate local Pretreatment programs and identify areas for improvement to build or maintain effective local programs in Region 8. The audit focused on the MWR's building blocks of its Pretreatment program: legal authority, local limits, industrial user inventory and characterization, quality of permits, sampling, inspections, and enforcement. In addition, the audit served as a forum for the EPA and the MWR to discuss the implementation of the Pretreatment regulations, and for the EPA to provide outreach, education, and training.

The enclosed audit report contains corrective action items based on regulatory requirements and recommendations associated with the above-mentioned programmatic areas to ensure the MWR is adequately implementing and enforcing its program in accordance with the EPA regulations. The Pretreatment Audit Summary Table of the report provides a listing of corrective actions, based on audit findings, to be addressed by the MWR.

Within thirty (30) days of receipt of this report: (1) provide the EPA with a summary of corrective actions taken, dates that the corrective actions will be taken to address each of the findings identified in the report, and/or any information that may change the findings; and (2) provide a schedule of status reports that summarize the progress of the Pretreatment Audit Summary Table corrective actions. These reports should be based on 6-month intervals. In addition to the corrective actions, recommendations that the MWR should review, and address are included in the report.

Ms. Robinette, thank you for the time and cooperation your staff provided during the audit of the MWR's Pretreatment Program. If you have any questions about the audit or this report, please contact me at (303) 312-6382 or garcia.al@epa.gov.

Sincerely,

ALFONSO

GARCIA

Al Garcia

Pretreatment Coordinator

Water Division

Digitally signed by ALFONSO
GARCIA
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Enclosures:

1. Pretreatment Audit Report
2. 2024-04-02 – Metro Legal Authority Review.pdf
3. Metro Permit Template Review.pdf
4. Region 8 - Facility Inspection Form.doc
5. 2024-04-29 - Meati Foods Cover.pdf
6. 2024-04-18 - Meati Foods Inspection Report.pdf
7. 2024-05-15- US Mint Cover.pdf
8. 2024-04-18 - US Mint Inspection Report.pdf
9. Metro ERP Review.pdf
10. MWR ERP - EPA Comments.pdf

cc: Bret Icenogle, Senior Industrial Pretreatment Engineering Manager, Metro Water Recovery
Jon Wallace, Pretreatment Coordinator, CDPHE