



Highlands Ranch Water and Sanitation District

Industrial Pretreatment Program Significant Noncompliance Publication

Per 40 CFR Part 403.8(f)(2)(viii), The Highlands Ranch Water and Sanitation District (Highlands Ranch Water) Industrial Pretreatment Program must notify the public annually of Industrial Users in significant noncompliance (SNC) with its rules and regulations and EPA Pretreatment regulations.

40 CFR Part 403.8(f)(2)(viii) of the Pretreatment Regulations states, For the purposes of this provision, a Significant Industrial User (or any Industrial User which violates paragraphs (f)(2)(viii)(C), (D), or (H) of this section) is in significant noncompliance if its violation meets one or more of the following criteria:

(A) Chronic violations of wastewater Discharge limits, defined here as those in which 66 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period exceed (by any magnitude) a numeric Pretreatment Standard or Requirement, including instantaneous limits, as defined by 40 CFR 403.3(l);

(B) Technical Review Criteria (TRC) violations, defined here as those in which 33 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period equal or exceed the product of the numeric Pretreatment Standard or Requirement including instantaneous limits, as defined by 40 CFR 403.3(l) multiplied by the applicable TRC (TRC = 1.4 for BOD, TSS, fats, oil, and grease, and 1.2 for all other pollutants except pH);

(C) Any other violation of a Pretreatment Standard or Requirement as defined by 40 CFR 403.3(l) (daily maximum, long-term average, instantaneous limit, or narrative Standard) that the POTW determines has caused, alone or in combination with other Discharges, Interference or Pass Through (including endangering the health of POTW personnel or the general public);

(D) Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in the POTW's exercise of its emergency authority under paragraph (f)(1)(vi)(B) of this section to halt or prevent such a discharge;

(E) Failure to meet, within 90 days after the schedule date, a compliance schedule milestone contained in a local control mechanism or enforcement order for starting construction, completing construction, or attaining final compliance;

(F) Failure to provide, within 45 days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules;

(G) Failure to accurately report noncompliance;

(H) Any other violation or group of violations, which may include a violation of Best Management Practices, which the POTW determines will adversely affect the operation or implementation of the local Pretreatment program.

Other instances of noncompliance can also be considered significant according to the Highlands Ranch Water Enforcement Response Plan (ERP).

All Industrial Users in SNC are subject to Highlands Ranch Water enforcement actions to address violations. For more additional information, contact Nick Marusin, Laboratory Manager, at 303-791-2185 ext. 3520.

Industrial User	SNC Criteria	Occurrences of Noncompliance
Circle K 8663 S. Quebec St. Highlands Ranch, CO 80130	40 CFR Part 403.8(f)(2)(viii): (H) Other violations Highlands Ranch Water ERP Failure to maintain a grease interceptor every three months. (>1 Occurrence in one year) Failure to comply with an order or request for information.	1 - Failure to maintain a grease interceptor (1 st quarter 2024) 2 - Failure to submit grease manifest within 30 days of pumping/cleaning (1 st quarter 2024) 3 - Failure to maintain a grease interceptor (2 nd quarter 2024) 4 - Failure to submit grease manifest within 30 days of pumping/cleaning (2 nd quarter 2024) 5 - Failure to maintain a grease interceptor (3 rd quarter 2024) 6 - Failure to submit grease manifest within 30 days of pumping/cleaning (3 rd quarter 2024) 7 - Failure to maintain a grease interceptor (4 th quarter 2024)

		<p>8 - Failure to submit grease manifest within 30 days of pumping/cleaning (4th quarter 2024)</p> <p>9 - Failure to comply with Notice of Violation requirement (January 30, 2025 deadline)</p>
<p>Circle K 9275 S. Broadway Highlands Ranch, CO 80129</p>	<p>40 CFR Part 403.8(f)(2)(viii): (H) Other violations</p> <p>Highlands Ranch Water ERP Failure to maintain a grease interceptor every three months. (>1 Occurrence in one year)</p> <p>Failure to comply with an order or request for information.</p>	<p>1 - Failure to maintain a grease interceptor (1st quarter 2024)</p> <p>2 - Failure to submit grease manifest within 30 days of pumping/cleaning (1st quarter 2024)</p> <p>3 - Failure to maintain a grease interceptor (2nd quarter 2024)</p> <p>4 - Failure to submit grease manifest within 30 days of pumping/cleaning (2nd quarter 2024)</p> <p>5 - Failure to maintain a grease interceptor (4th quarter 2024)</p> <p>6 - Failure to submit grease manifest within 30 days of pumping/cleaning (4th quarter 2024)</p> <p>7 - Failure to comply with Notice of Violation requirement (January 30, 2025 deadline)</p>
<p>Circle K 9356 S. Colorado Blvd. Highlands Ranch, CO 80126</p>	<p>40 CFR Part 403.8(f)(2)(viii): (H) Other violations</p> <p>Highlands Ranch Water ERP Failure to maintain a grease interceptor every three months. (>1 Occurrence in one year)</p>	<p>1 - Failure to maintain a grease interceptor (1st quarter 2024)</p> <p>2 - Failure to submit grease manifest within 30 days of pumping/cleaning (1st quarter 2024)</p> <p>3 - Failure to maintain a grease interceptor (2nd quarter 2024)</p>

	<p>Failure to comply with an order or request for information.</p>	<p>4 - Failure to submit grease manifest within 30 days of pumping/cleaning (2nd quarter 2024)</p> <p>5 - Failure to maintain a grease interceptor (3rd quarter 2024)</p> <p>6 - Failure to submit grease manifest within 30 days of pumping/cleaning (3rd quarter 2024)</p> <p>7 - Failure to maintain a grease interceptor (4th quarter 2024)</p> <p>8 - Failure to submit grease manifest within 30 days of pumping/cleaning (4th quarter 2024)</p> <p>9 - Failure to comply with Notice of Violation requirement (December 31, 2024, deadline)</p>
<p>Wing Stop 9559 S. University Blvd. #106 Highlands Ranch, CO 80126</p>	<p>40 CFR Part 403.8(f)(2)(viii): (H) Other violations</p> <p>Highlands Ranch Water ERP Failure to comply with an order or request for information.</p>	<p>1 - Failure to maintain a grease interceptor (Due by October 31, 2024)</p> <p>2 - Failure to submit grease manifest within 30 days of pumping/cleaning (Due by November 30, 2024)</p> <p>3 - Failure to comply with Notice of Violation requirement (January 31, 2025 deadline)</p>