

# METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

RD-925

## User Charge Annual Certified Statement

For the 2018 Reporting Year

### Reporting Facility Information

User Account No.

027723

1. Name Pullman Innovations  
Address 2701 East 100th Street  
City, State, Zip Code Chicago, IL 606178  
Telephone 773-978-5130

Significant-Industrial User (SIU): ☒ Yes ☐ No

If Yes, enter the number of Outlets in your Discharge Authorization (DA): 1

User Charge Classification:

☒ Large Commercial-Industrial User (LCIU) ☐ Tax-Exempt User (TXE)

2. Nature of Business: Vegetable Oil By Product Processing and Distribution Facility
3. a. No. of Employees: 26 b. No. of Workdays: 254 c. Operating on Weekends? ☒ Yes ☐ No
4. a. Number of Final Outlets (User Charge): 1 b. Number of Incoming Water Meters: 1  
c. Does this facility have an APPROVED Flow Methodology? ☒ Yes ☐ No
5. Dates of User Charge Sampling: See attached FW sheets

### Annual Quantities

		Total
6. Volume (gallons):		16,411,488 gal
7. 5-Day Biochemical Oxygen Demand (BOD):	mg/L	2,768,462 lbs
8. Suspended Solids (SS):	mg/L	859,061 lbs

### User Charge Computation

9. Total Annual Volume Charge:	Multiply Line 6 by \$0.00026428	\$ 4,337.23
10. Total Annual 5-Day BOD Charge:	Multiply Line 7 by \$0.22303	\$ 617,450.08
11. Total Annual SS Charge:	Multiply Line 8 by \$0.13648	\$ 117,244.65
12. Total Wastewater Loading Charge:	Sum Lines 9, 10, and 11	\$ 739,031.95
13. Administrative Cost Recovery (ACR) Charges:	Line 7 from the MPR Charge Worksheet	\$ 8,510.00
14. Total Gross User Charge:	Sum of Lines 12 and 13	\$ 747,541.95
15. Total Second Installment Property Taxes Paid to Metro Water Reclamation District:		\$ 2,600.98
16. Total Ad Valorem Tax Credit:	Multiply Line 15 by 0.301	\$ 782.89
17. Total Net User Charge:	Subtract Line 16 from Line 14	\$ 746,759.06
18. Total Payments Made (Year to Date):	Total of RD-913 Invoice Payments made for Reporting Year 2018	\$ 374,261.67
19. Total User Charge Remaining Due:	Subtract Line 18 from Line 17	\$ 372,497.39

Prepared By: Eric Jensen  
Company/Title: EMT, Inc. / Project Manager  
E-mail Address: ejensen@emt.com Telephone No.: 847-967-6666

Certification: The undersigned, being first duly sworn on oath, deposes and says that he/she has examined this statement and its supporting documentation and to the best of his/her knowledge and belief, same are true, correct, and complete.

Signature of Officer/Owner: [Signature]  
PRINT Name & Title: CRA

E-mail Address: SHANE D. REEDMAN Telephone No.: 312 909 2202

Witnessed By: Lee Ann Strohmman  
On: 2/19/19 (mm/dd/yy)



2018 User Charge Rates	
Volume:	\$264.28 per million gallons
5-Day BOD:	\$223.03 per thousand pounds
Suspended Solids:	\$136.48 per thousand pounds
OM&R Factor:	0.301

For District Use Only

Year: 2018  
Post Date: 2-19-19  
MH

#27723

The completed RD-925 Form must be postmarked by February 20, 2019 and mailed to:

Metropolitan Water Reclamation District of Greater Chicago, P.O. Box 10687, Chicago, IL 60610-0687

## Scapardine, Barbara

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**From:** MWRD-UCTS  
**Sent:** Monday, March 25, 2019 1:02 PM  
**To:** shurst@merchantsdata.com  
**Cc:** ejensen@emt.com  
**Subject:** Notification of Revision for the 2018 RD-925 – Pullman Innovations, User No. 27723

Dear Mr. Hurst:

The Metropolitan Water Reclamation District of Greater Chicago (District) has reviewed your 2018 User Charge Annual Certified Statement (RD-925). As a result of this review, the District has revised the Net User Charge (NUC) as follows:

2018 NUC as reported by the User	\$746,759.06
2018 NUC as revised by the District	\$839,163.43

The reason for this revision is that the Metropolitan Water Reclamation District reviewed your request submitted on February 18, 2018, to isolate weekend flows and loadings for the 2018 User Charge Annual Certified Statement reporting year. According to the User Charge Ordinance, Appendix B, Section II, B, any change in a User's sampling methodology shall be approved by the District. The User shall demonstrate to the District's satisfaction, by a written proposal and adequate documentation, that the change in sampling methodology is proper to obtain representative concentrations. In addition, Appendix A, Section III states, "Use of a methodology outlined will be allowed only after receipt of prior written approval by the Director. This approval will be effective for the year stated in the approval and subsequent years, or until the approval is revoked by the Director. The proposal must be signed by the authorized representative of the User, and certified as accurate and complete by a Registered Professional Engineer licensed by the state of Illinois". Until the approval is granted, Pullman Innovations must use approved metering methodology when reporting its User Charge liability. For further information, please contact Ramone at AdamsR2@mwrdd.org or call 312-751-3019.

If you have any questions regarding how the NUC was calculated, please contact Barbara Scapardine, Environmental Specialist, at (312) 751-5938, or you may direct your email response to mwrdd-ucts@mwrdd.org.

If you have any questions regarding overpayments or balances due on your account, please contact Mr. Mete Hachim, Supervising Accountant of the District's Finance Department, at 312-751-6516, or you may direct your email response to usercharge@mwrdd.org. Please note that in accordance with Section 7d of the User Charge Ordinance, interest on unpaid User Charges shall accrue from the February 20, 2019, due date.

Edwin P. Ignacio  
Supervising Environmental Specialist  
Industrial Waste Division  
Metropolitan Water Reclamation District of Greater Chicago  
(312) 751-3000

EPI:BS:lk  
U27723/#0240  
UC41-E

*This email notification replaces the District's correspondence by US mail and has been prepared to reduce paper and to address the subject in a prompt manner. Please keep a copy for your files.*



2701 East 100<sup>th</sup> St  
Chicago, IL 60617

Phone: 773.978.5130

April 18, 2019

Mr. Edward Podczerwinski  
Director of Monitoring and Research  
User Charge Section  
Metropolitan Water Reclamation District of Greater Chicago  
100 East Erie Street  
Chicago, IL 60611

**RE: Appeal of District Revision for the 2018 RD-925 – Pullman Innovations User No. 27723**

Dear Mr. Podczerwinski,

Pullman Innovations wishes to appeal the District's revision of the 2018 RD-925 User Charge Annual Certified Statement. The 2018 Net User Charge was reported by Pullman Innovations at \$746,759.06 and then revised by the MWRD to \$839,163.43.

The intent of the 2018 RD-925 filed by Pullman Innovations was to include weekend BOD and TSS data. Although Pullman Innovations could only provide 6 days of weekend BOD and TSS data collected in 2019, filing the 2018 RD-925 on weekday samples results in a Net User Charge is not representative of the annual discharge.

The Metropolitan Water Reclamation District (MWRD) performed 2018 sampling studies Monday through Thursday collecting 124 samples for BOD and 138 samples for TSS. The MWRD merged the 2018 sample results and found the flow weighted average for BOD is 22,683 mg/l and TSS at 7,209 mg/l excluding one isolated day for BOD at 61 mg/l and TSS at 92 mg/l. All 2018 samples represent concentrations from weekday discharge only.

Pullman Innovations filed its 2018 RD-925 discharge and BOD/TSS concentrations by weekday (Monday through Thursday) and weekend (Friday through Sunday). Due to the lack of representative weekend samples, Pullman calculated average annual weekend wastewater discharge volume and applied it to the BOD/TSS concentrations found from sampling studies 2/1-4/19 and 2/8-11/19. This weekend wastewater discharge was extrapolated to 52 weekends and filed on the facilities RD-925.

In 2019 and all subsequent years, Pullman Innovations intends to sample Monday to Monday to include weekend data. Pullman Innovations also request that the MWRD conduct sampling studies includes weekends as well.

If you have any questions, feel free to contact me at 312-909-2202.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen D. Hurst", is written over a horizontal line.

Stephen D. Hurst  
Chief Regulatory Officer



## Protecting Our Water Environment

### BOARD OF COMMISSIONERS

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Barbara J. McGowan  
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### Metropolitan Water Reclamation District of Greater Chicago

#### INDUSTRIAL WASTE DIVISION

111 EAST ERIE STREET CHICAGO, ILLINOIS 60611-2893 p: 312.751.3044 p: 312.751.3000

**Edward W. Podczerwinski, P.E.**  
Director of Monitoring and Research

August 7, 2019

Mr. Steve Hurst  
Chief Regulatory Officer  
Pullman Innovations  
2701 East 100th Street  
Chicago, Illinois 60617

Dear Mr. Hurst:

Subject: Appeal No. 19D-002 – Revision of the 2018 Net User Charge in the  
Amount of \$839,163.43

The Metropolitan Water Reclamation District of Greater Chicago (District) makes reference to a meeting on June 20, 2019, regarding the subject appeal. In attendance at the meeting representing Pullman Innovations (Pullman) were you, Mr. Alonso Alvarez, and your consultants, Messrs. Michael Gower, Eric Jensen and Adam Szafran of Environmental Monitoring and Technologies, Inc. (EMT). Representing the District were Messrs. Gregory Yarnik, Carlando Owens, Ramone Adams, Charles Newman, Luke Toonen and Ms. Barbara Scapardine of my staff.

Pullman filed its User Charge Annual Certified Statement (RD-925) for the 2018 reporting year on February 19, 2019, and reported a Net User Charge (NUC) of \$746,759.06. Enclosed with Pullman's RD-925 was a letter dated February 18, 2019, which outlined a methodology used in its reporting. Pullman separated the reporting year into weekdays and weekends, with weekdays from Monday through Thursday and weekends from Friday through Sunday. Pullman claimed that wastewater concentrations were lower during weekends than during weekdays. The flow-weighted average wastewater concentrations for biochemical oxygen demand (BOD) and suspended solids (SS) obtained during sampling studies conducted on weekdays were applied to the volume of wastewater discharged during weekdays. Similarly, flow-weighted average wastewater concentrations obtained during sampling studies conducted on weekends were applied to the volume of wastewater discharged during weekends. Since neither the District nor Pullman performed sampling studies during weekends in 2018, Pullman used the BOD and SS wastewater concentrations obtained during its sampling studies conducted in 2019 for the weekend concentrations.

Subject: Appeal No. 19D-002 – Revision of the 2018 Net User Charge in the Amount of \$839,163.43

In an email sent on March 25, 2019, the District notified Pullman that the District revised the NUC in Pullman's 2018 RD-925 from \$746,759.06 to \$839,163.43. The District calculated Pullman's 2018 User Charge liability based on a methodology approved by the District in its letter of March 10, 1999. The District-approved methodology allowed the use of a magnetic flowmeter to measure the process wastewater volume and a water meter to measure the domestic water usage. Separating the reporting year into weekdays and weekends was not a part of the methodology.

In accordance with Section 9.a.(1)(a) of the User Charge Ordinance (Ordinance), Pullman appealed the revised NUC in its letter dated April 18, 2019. During the appeal meeting, Pullman reiterated its request to separate the reporting year into weekdays and weekends and to use the BOD and SS concentrations obtained during weekend sampling in 2019 for the weekend BOD and SS concentrations for 2018. Pullman stated that production data will be submitted to demonstrate production and discharge patterns on weekends throughout 2018. In an email sent on July 19, 2019, EMT, on behalf of Pullman, transmitted information on the individual hours worked by each employee on weekends from October 6, 2018, to July 13, 2019. In a separate email, EMT transmitted a Direct Discharge Metering Methodology Proposal.

The District's responses are as follows:

1. Pullman's request to alter its User Charge reporting methodology is not supported by the Ordinance. Appendix B, Section VII, of the Ordinance states the User's methodology for applying sampling data must be identified in the Users sampling proposal and must be approved by the District.
2. The use of 2019 sampling results for 2018 is not allowed. Furthermore, the use of estimated daily wastewater discharge volumes to obtain flow-weighted average concentrations is not acceptable as it does not reflect accurate daily discharge volumes from the facility.
3. The information provided in Pullman's July 19, 2019, email does not contain relevant data to support similar pattern in wastewater discharge characteristics at the facility in 2018 and 2019.
4. The District will review Pullman's Direct Discharge Metering Methodology Proposal under separate cover.

Based on the determinations referenced above, the District has determined that the 2018 NUC liability for Pullman was properly calculated and remains at \$839,163.43. The calculation and data are presented on the enclosed Table 1. This closes the subject appeal.

Mr. Steve Hurst

3

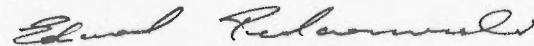
August 7, 2019

Subject: Appeal No. 19D-002 – Revision of the 2018 Net User Charge in the Amount of \$839,163.43

In accordance with Section 9.b. of the Ordinance, if the User does not concur with the determination of this office, it may petition the District's Board of Commissioners (Board) for a hearing. Any such request for a hearing by the Board shall be made within 30 days after receipt of this letter.

If you have any questions regarding this matter, please contact Ms. Barbara Scapardine, Environmental Specialist, at (312) 751-5938.

Very truly yours,



Edward W. Podczerwinski, P.E.  
Director  
Monitoring and Research Department

EWP:BS:lk

Enclosure

Certified No. 7018 1830 0001 4764 4639

cc: Mr. Alonso Alvarez  
Mr. Michael Gower  
Mr. Eric Jensen  
Mr. Adam Szafran  
Mr. Gregory Yarnik  
Mr. Carlando Owens  
Mr. Ramone Adams  
Mr. Charles Newman  
Mr. Luke Toonen

U27723/#0605

# METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

TABLE 1

## DISTRICT RECOMPUTATION OF 2018 USER CHARGE

FOR  
PULLMAN INNOVATIONS  
2701 EAST 100<sup>th</sup> STREET  
CHICAGO, ILLINOIS 60617

<u>PARAMETERS</u>	<u>TOTALS</u>
Volume (gal) <sup>1</sup>	16,411,488
5-Day BOD (mg/L) <sup>2</sup>	22,683
5-Day BOD (lbs)	3,104,663
SS (mg/L) <sup>2</sup>	7,209
SS (lbs)	986,709
Total Annual Volume Charge	\$ 4,337.23
Total Annual BOD Charge	\$ 692,433.06
Total Annual SS Charge	\$ 134,666.03
Minimum Pretreatment Requirement Charge	\$ 8,510.00
Total Annual Gross User Charge	\$ 839,946.32
Less Total Ad Valorem Tax Credit	\$ 782.89
Total Net User Charge <sup>3</sup>	\$ 839,163.43

<sup>1</sup>Annual discharge volume based on submitted wastewater discharge meter readings, and domestic and boiler water meter readings.

<sup>2</sup>Flow-weighted average wastewater concentrations from User and District's sampling studies conducted in 2018 at Outlet No. 1A.

<sup>3</sup>Applicable interest charge not included.

U27723/#0605(1)



2701 E. 100<sup>th</sup> Street Phone: 773.978.5130  
Chicago, IL 60617 Fax: 773.978.7125

October 17, 2019

Mr. Edward Podczerwinski  
Director of Monitoring and Research  
User Charge Section  
Metropolitan Water Reclamation District of Greater Chicago  
100 East Erie Street  
Chicago, IL 60611

**RE: Appeal No. 19D-002- petition to the Board of Commissioners**

Dear Mr. Podczerwinski,

Pullman Innovations does not concur with the District's calculation of the 2018 User Charge liability at \$839,163.43. Pullman Innovations wishes to appeal this decision with the Board of Commissioners and demonstrate that the District's calculation does not accurately represent the yearly discharge and over estimates the User Charge liability owed by Pullman Innovations.

The intent of the appeal by Pullman Innovations is to have the District consider the inclusion of weekend samples of BOD and TSS that are not currently included in the overall calculation of the User Charge Statement. Pullman Innovations has conducted weekend sampling studies and they indicate lower concentrations of BOD and TSS discharge other than the District's annual RD-925 statement representing only weekday concentrations of BOD and TSS. Additionally, Pullman Innovations discharge log readings show evidence of discharge during weekends in 2018.

The Metropolitan Water Reclamation District (MWRD) performed 2018 sampling studies Monday through Thursday collecting 124 samples for BOD and 138 samples for TSS. The MWRD merged the 2018 sample results and found the flow weighted average for BOD is 22,683 mg/l and TSS at 7,209 mg/l excluding one isolated day for BOD at 61 mg/l and TSS at 92 mg/l. All 2018 samples represent concentrations from weekday discharge only.

If you have any questions, feel free to contact me at 847-867-9582.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew T. Dyer", written over a light blue horizontal line.

Matthew T. Dyer  
Chief Operating Officer

OF GTR. CHGO.  
MWRD

2019 OCT 21 AM 11:07

DIRECTOR OF M&R