Septic Receiving Criteria

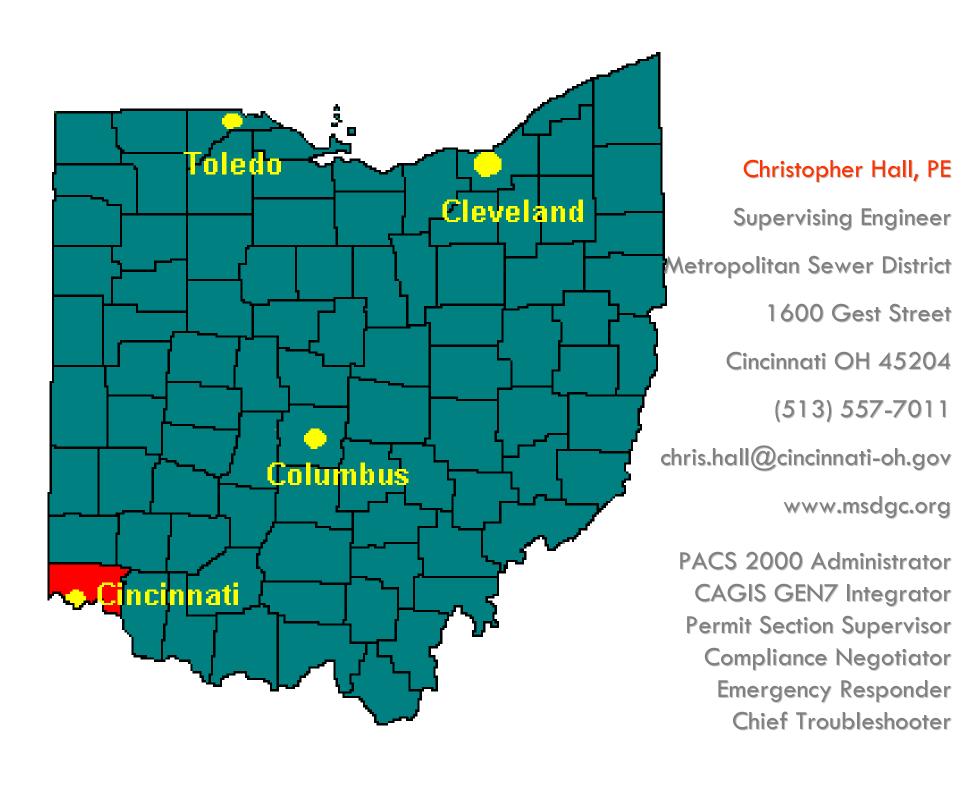
New Policies and Procedures at Cincinnati MSD

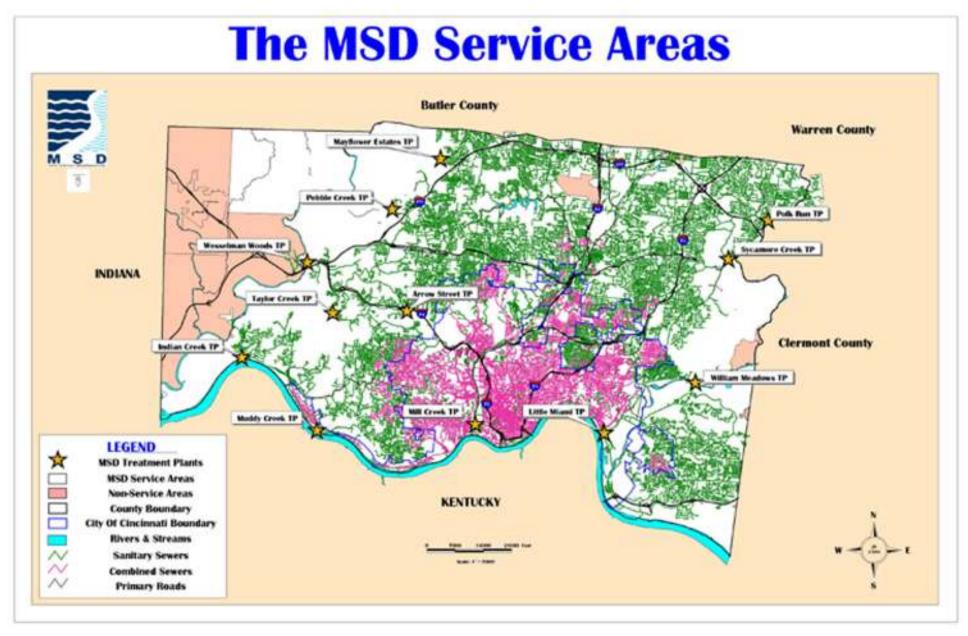




Operator Training Committee of Ohio, Inc. Class III & IV Workshop

> August 15, 2007 Columbus, OH

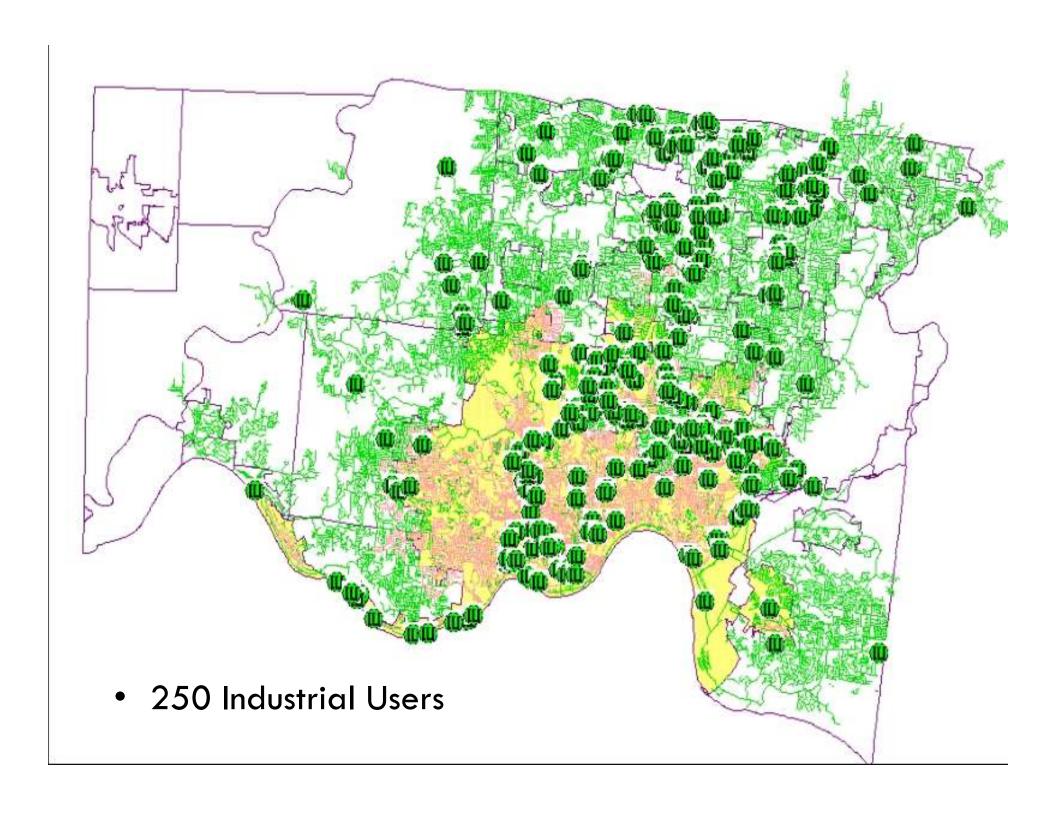


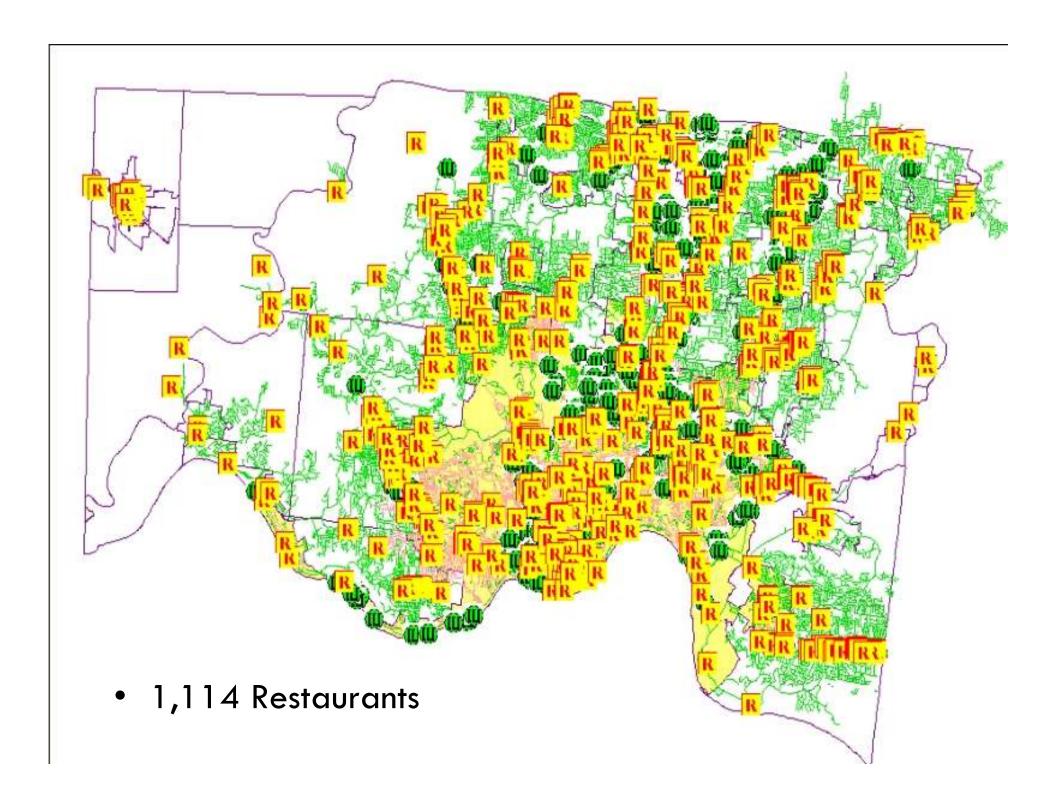


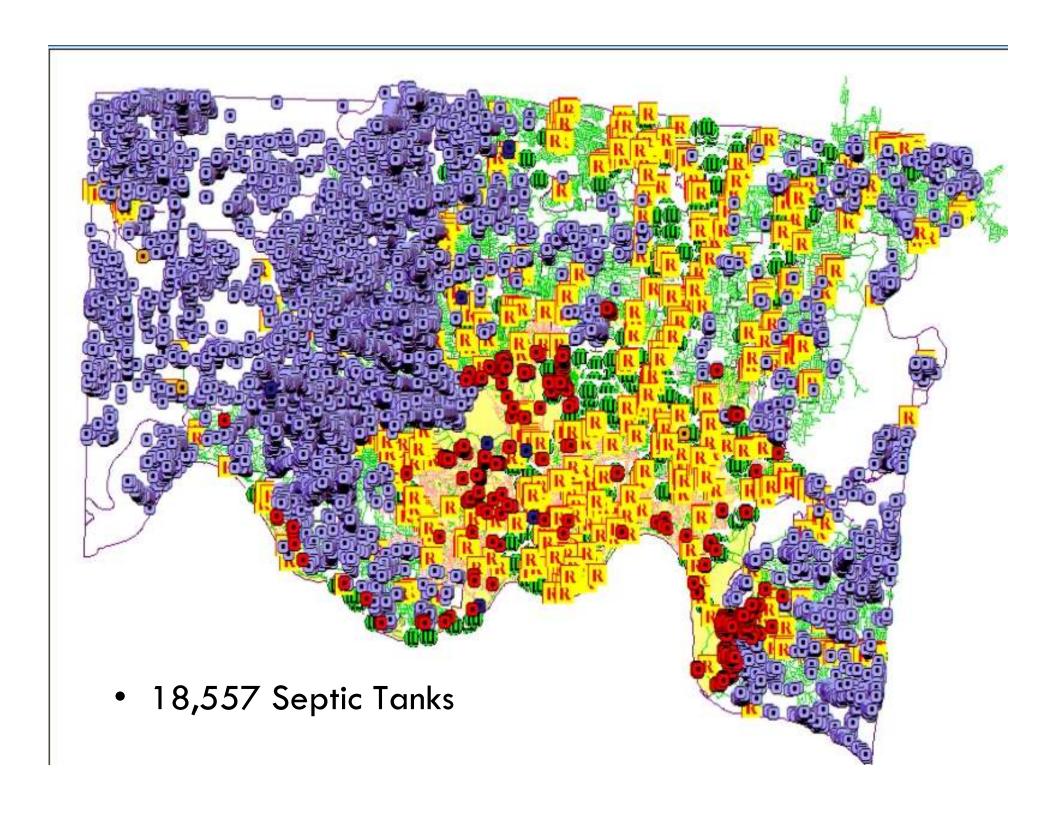
800,000 residents; 200,000 connections; 400 square miles; 33 municipalities and townships; 3,000 miles of sewer; 7 major, 8 minor treatment plants; 8 major, 136 minor pumping stations; 175 million gpd; 150 Significant Industrial Users - 250 Permits

Pretreatment

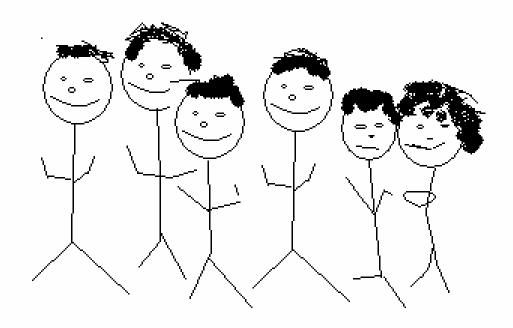
- Prevention or removal of pollutants from non-residential sources discharging to the Publicly Owned Treatment Works (POTW) that may interfere with wastewater treatment system operations or pass through into the environment







Our staff



Engineers, Industrial Investigators, Industrial Inspectors, Pretreatment Specialists

Wastewater Engineering

- Receives applications
- Issues bonds
- Issues stickers
- Sells tickets

Industrial Waste

- Regulates the haulers
- Permit generators

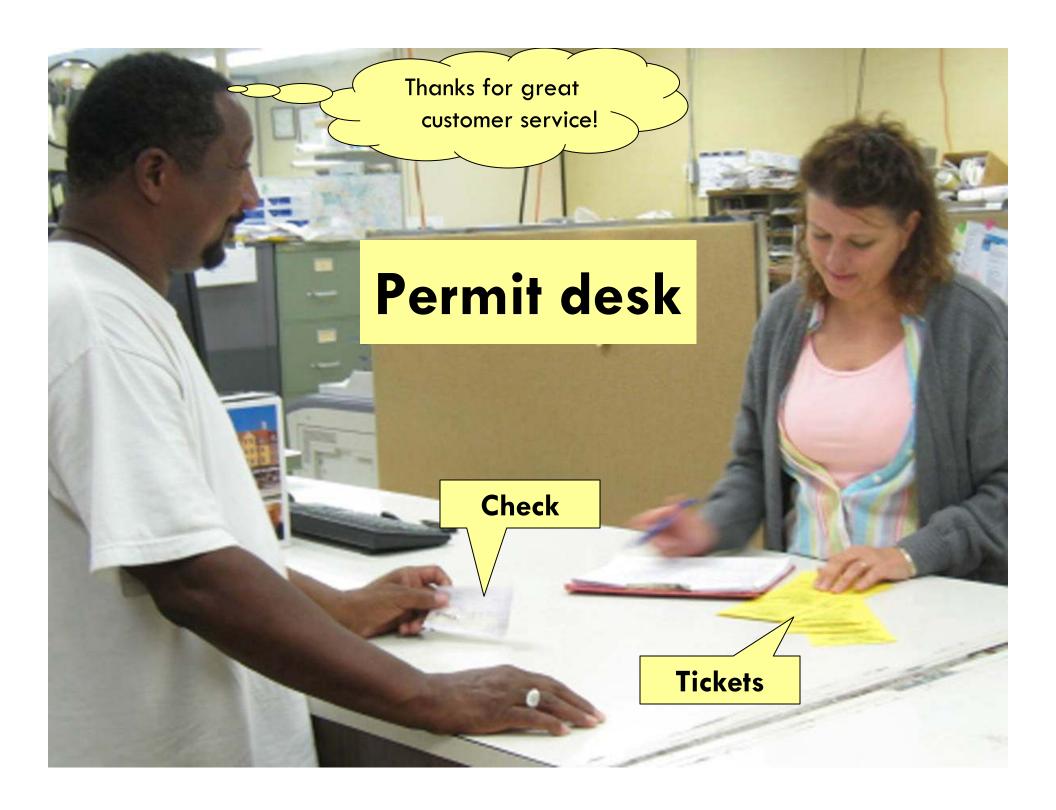
Wastewater Administration

- Manages security guards at the gate
- Handles the accounting

Wastewater Treatment

- Receives the waste
- Treats the waste
- Maintains the facility







FEE \$40.00 NO. 62352

2007 Sanitary Waste Ticket THE METROPOLITAN SEWER DISTRICT OF GREATER CINCINNATI

This ticket permits MSD licensed haulers to discharge 1000 gallons,

Sanitary Waste

to the District's system at the designated location as per MSD's Rules and Regulations. Location(s)

71	The state of
1)	
SIGNATURE - RESPONSIBLE OFFICIAL	DATE

PART 1 - SEWER DISTRICT - RETAIN



FEE \$40.00 NO. 109659

Commercial / Industrial Waste Ticket THE METROPOLITAN SEWER DISTRICT OF GREATER CINCINNATI

This ticket permits MSD licensed haulers to discharge 1000 gallons.

Commercial / Industrial Waste to the District's system at the designated location as per MSD's Rules and Regulations.

Restaurant Name(s)	Location(s)
1	
2)	
11	
SIGNATURE - RESPONSIBLE OFFICE	AL DATE
VEHICLE PERMIT NO	

PART 1 - SEWER DISTRICT - RETAIN

VEHICLE LICENSE NO.

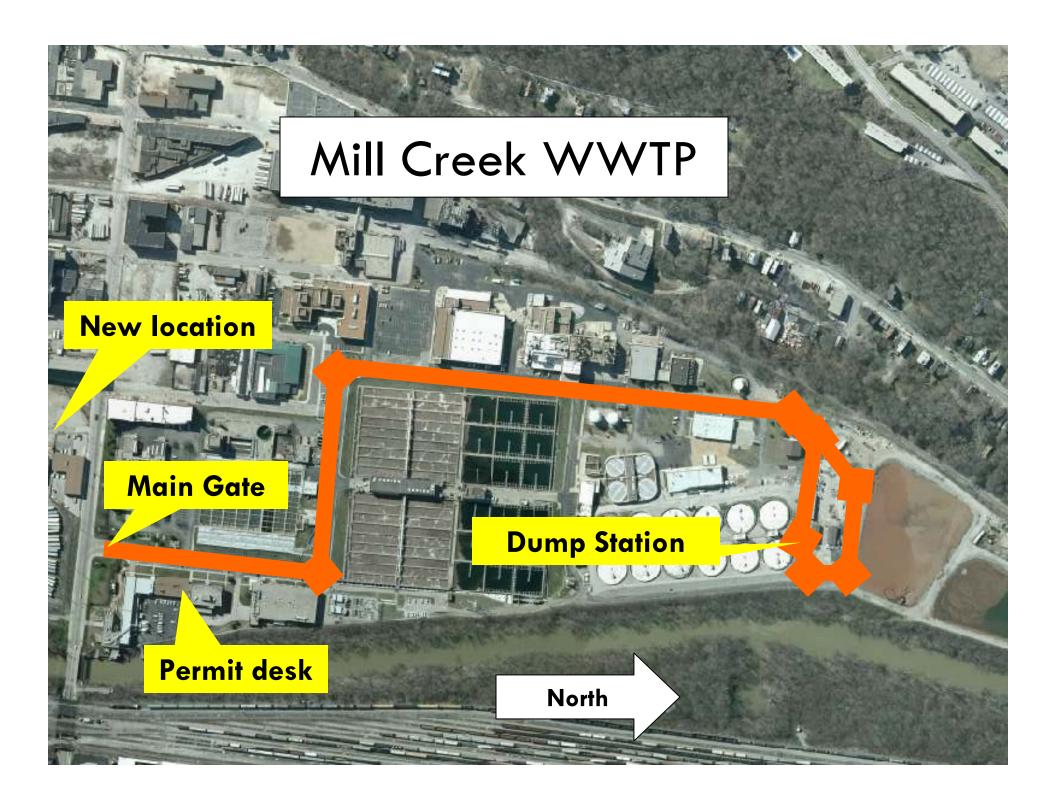


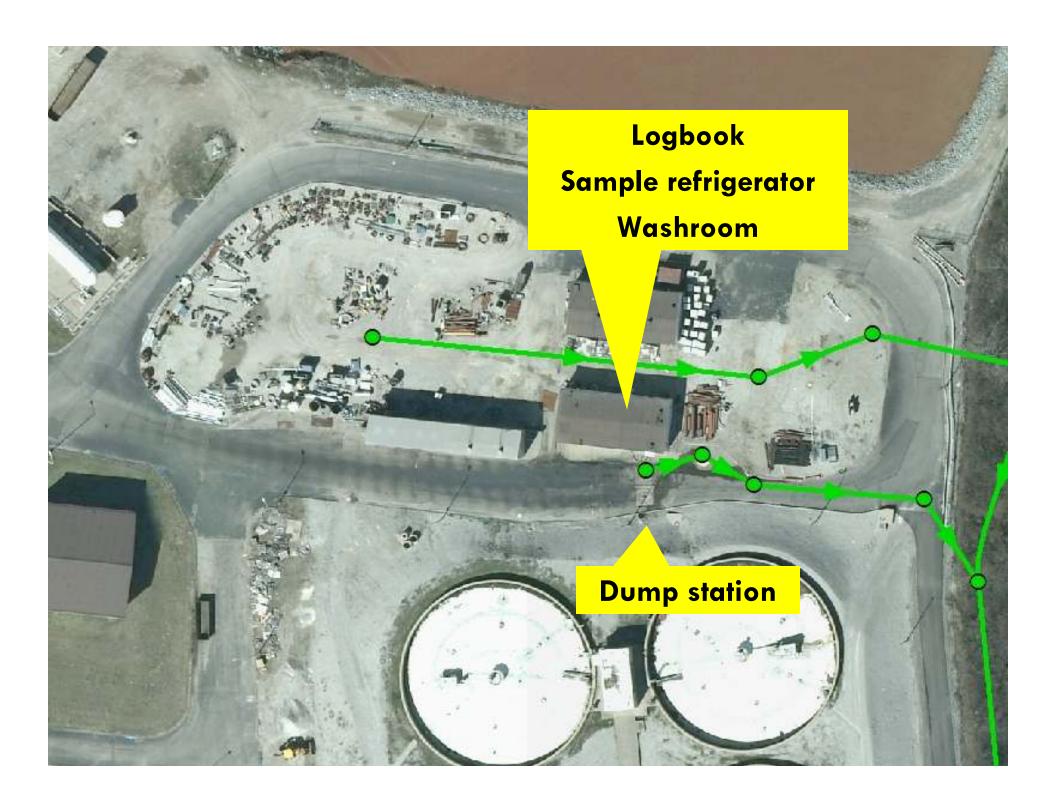




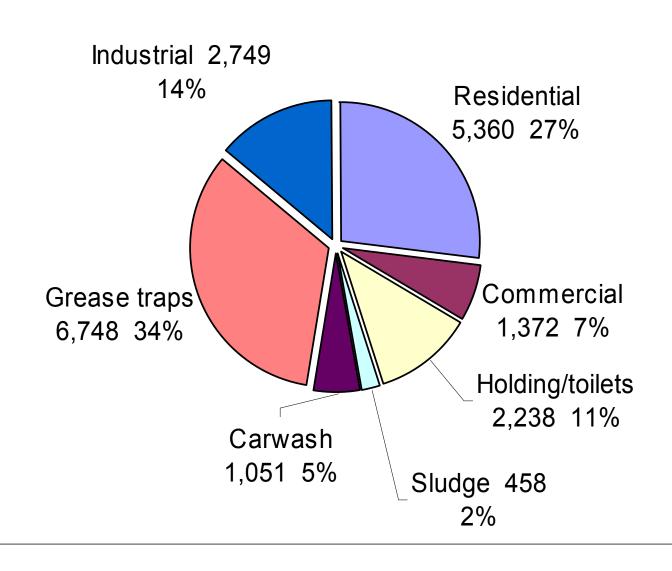


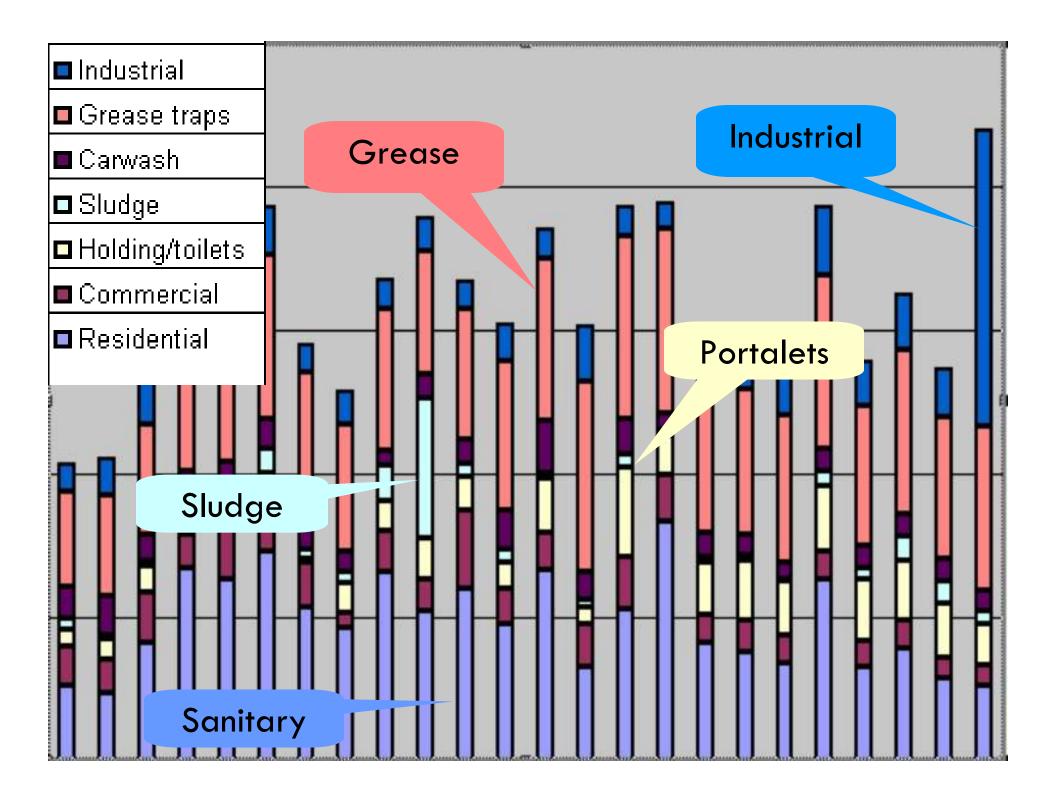




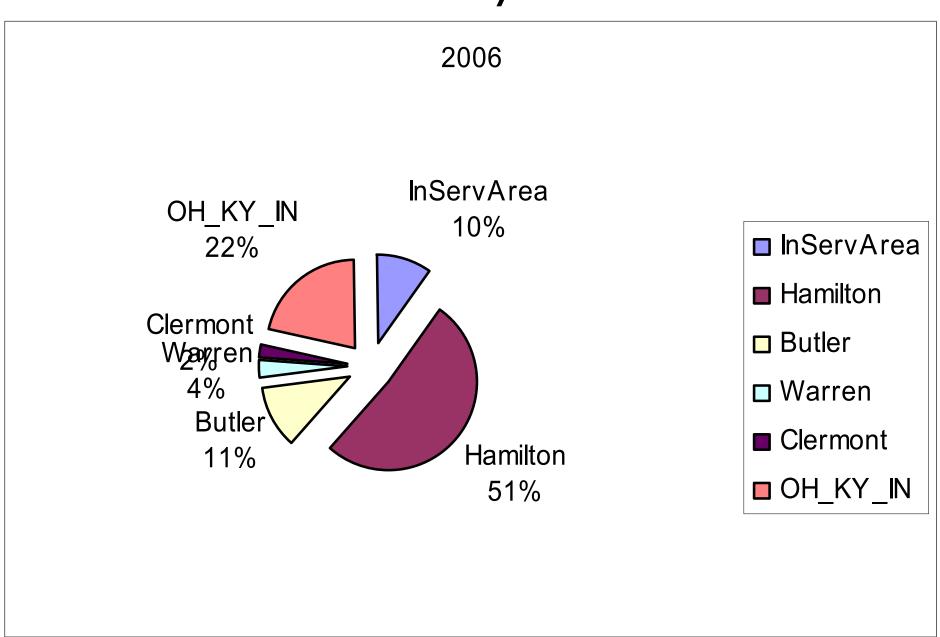




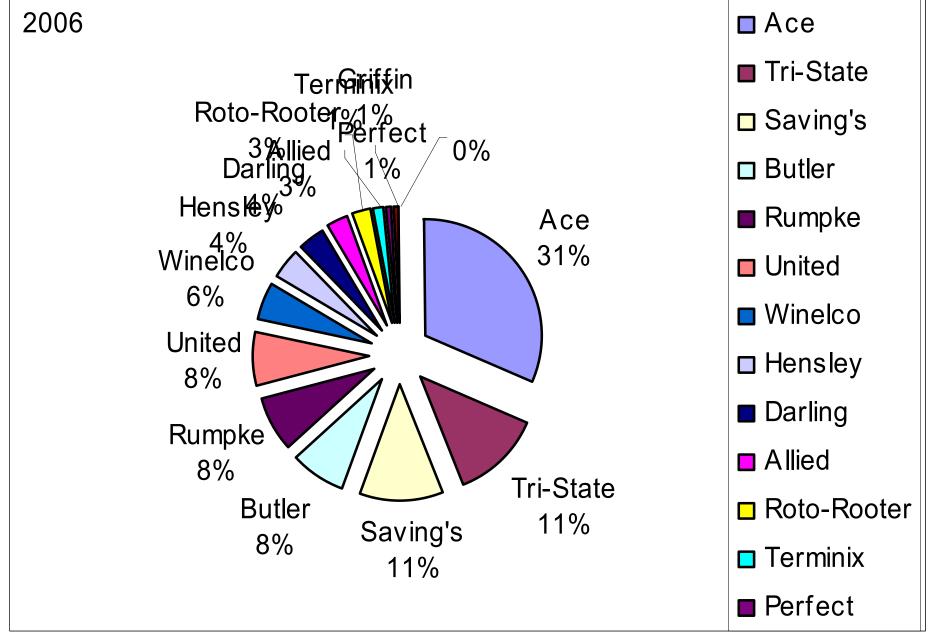


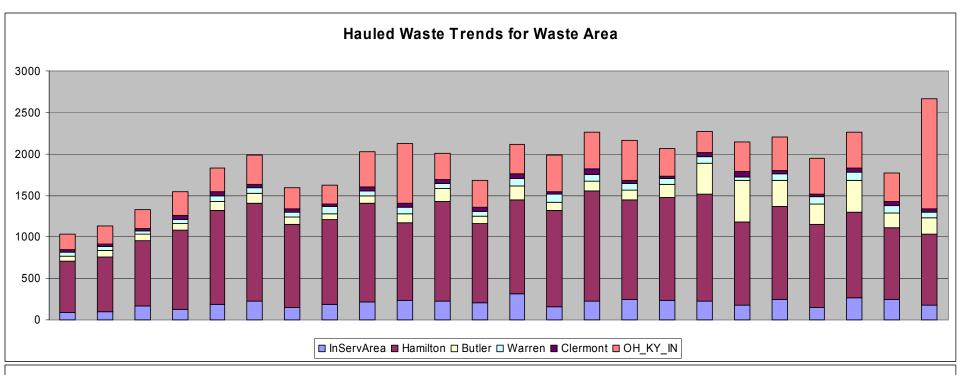


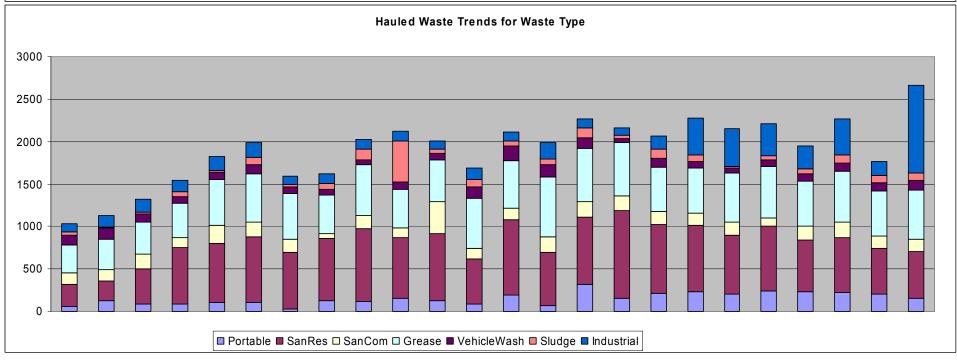
Waste by Area



Waste by hauler Pie Chart







Issues for DIW in 2003

- US EPA Centralized Waste Treatment regulations became effective December 22, 2003. Ace Sanitation and others were bringing CWT waste to MSD.
- MSD R&R only authorized sanitary waste from inside the District Service Area.
- All other waste required a special authorization -- none were in effect. Most waste haulers were not operating in strict adherence to the MSD R&R.
 - Hauling industrial wastes and sanitary waste from other Ohio Counties, Kentucky and Indiana
- Most Waste Haulers saw implicit approval for this practice in the sale of grease tickets by MSD.

Adopted Strategy

- Regulatory Structure
 - Implement guidelines for haulers and generators.
 - Tighten checks and balances.
 - Establish a relationship with the haulers for education and cooperation.
 - Regulate CWT waste
- Data Gathering
 - Determine volumes for different wastestreams and sources inside and outside DSA

Regulatory Structure

- Issue Special Hauled Waste Permits to permitted and bonded haulers
 - Authorize compatible outside DSA waste, commercial waste, and some industrial waste.
 - Approve compatible waste streams.
- Issue Hauled Waste Generator Permits to industrial waste sources
 - Require waste generators to characterize their wastes and receive prior approval.
 - Regulating industrial wastes may increase revenue.

Data Gathering

- Require periodic reports from haulers and generators (monthly or quarterly).
- Require counts of tickets from wastestreams and sources, such as sanitary, commercial, industrial.
- Inspect hauler and generator records for completeness and accuracy.

IUN 3282 MON-SMR	Monthly R	,	February			
SPECIAL HAULED WASTE PERMIT Permittee: Ace Sanitation Service, LLC MSD Permit Number: HAU-3282	Effective Date: 6/1/2006		Month Industrial Category: Expiration Date:			Year WasteHauler 5/31/2009
Attn Chris Hall				444	-	04 01
Sanitary Wastes (1000 gallons)	Inside District Service Area	Hamulton County /500	Butler County /30	Warren County	Clermont County	Other Ohio KY, IN areas
Portable Toilets		85.700	2500		200	12400
Residential (single or two family housing unit)		25.700		12		70.76.6
Self-Contained Holding Tanks					—.	
Commercial housing (multiple family unit)		39 400		2000	3000	
Commercial business (retail, office, etc.)			6000	2000	2000	1000
Public buildings (school, office, etc.)		1500				
Commercial Wastes (1000 gallons)		0		1920112-001	0.4	2.4
Restaurant grease traps (Food consumed on the premi	ise)	97.940	13 410	6660	9240	14.00
Carwash (vehicle exterior only)		32.750	4000			6500
Utility chambers (telephone, electrical, etc.)		1500			,	
Coin operated laundry						
Commercial WWTP (wastewater treatment sludge)					 .	فت
Public WWTP (wastewater treatment sludge)		-	-		<u> </u>	10.00
Water Treatment Plant Sludge		A.000			_ننه_	

I CERTIFY UNDER THE PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED AND BASED UPON MY INQUIRY OF THOSE INDIVIDUALS RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, &CCURATE AND CONTROLLED INFORMATION INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT

DEBRA TEMKE

Industrial Wastes (1000 gallons)

Kellia Tonke

DATE SIGNED

Wastewater Pump Stations

Industrial waste from permitted generators

3290 Mm - SMR

IUN 3290 MON-SMR SPECIAL HAULED WASTE PERMIT	Monthly Report		Februces Month Industrial Category:			Year WasteHauler
Permittee: Saving's Liquid Waste, Inc. MSD Permit Number: HAU-3290 Attn Chris Hall	Effective Date:	o3/01/20			ion Date:	06/30/2008
Sanitary Wastes (1000 gallons)	Inside District Service Area	Hamilton County	Butler County	Warren	Clermont	Other Ohio KY, IN areas
Portable toilets and self-contained holding tanks		9000	County		<u> </u>	KI, IIV alcas
Residential (single or two family)		27000			51	
Commercial (public, school, office, retail, multi-fam				×	 .	
Commercial Wastes (1000 gallons)			2,747.98		1.41 4 515566	200 000 1
Restaurant grease traps (food consumed on the prem	ise)	35,000	1000		4000.	12000
Carwash (vehicle exterior only) and utility chambers		J000		·		3000
Water and Wastewater Treatment Plant (sludge, purn	np stations)———					
Industrial Wastes (1000 gallons)		7000	(00)		7	<u>1</u>
Industrial permitted generators		2000	6000			<u> </u>
	1			I N I I I I I I	=======================================	20
					· 5/-	· <u>p</u>
	*				1 22 .	
I CERTIFY UNDER THE PENALTY OF LAW THAT I HAVE PERSONA THOSE INDIVIDUALS RESPONSIBLE FOR OBTAINING THE INFORM THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE IN	MATION; I BELIEVE THE DOOR	DOL 2760 POSSIBILITY OF		5543	BASED UPON M COMPLETE. I A	Y INOUIRY OF M AWARE THAT
Ky W Coshws	Fymist					3/15/07
PRINTED NAME	SIGNATURE OF RESPONSE	BLE OFFICIAL	A STATE OF THE PARTY OF THE PAR			DATE SIGNED

Self Monitoring Reports

- SMR 84 2005
 - 6 areas x 14 kinds of waste = 84 data points
- SMR 42 2006
 - 6 areas x 7 kinds of waste = 42 data points
- SMR 21 2007
 - -3 areas x 7 kinds of waste = 21 data points
- SMR 9 2008
 - -3 areas x 3 kinds of waste = 9 data points

DIW Actions to Date

- Defined terms, reviewed rules and regulations.
- Revised Waste Hauler Application.
- Issued Special Hauled Waste Permits to all haulers
- Collected two years of hauled waste data
- Implemented Hauled Waste Generator application and permit process

Definitions

Waste User

Wastewater User Classification

Sewage Residential User

Holding Tank Waste Commercial User

Sanitary Sewage Industrial User

Commercial Waste Public User

Industrial Waste Service Area

Compatible Pollutant

Waste

- "Waste" shall mean sewage and any and all other waste substances, liquid, solid, gaseous, or radioactive, associated with human habitation; or of human or animal origin; or from any production, manufacturing, or processing operation of whatever nature, including such wastes placed within containers of whatever nature prior to, and for purposes of disposal.
- "Wastewater" shall mean a combination of the liquid and water-carried wastes from the premises together with any groundwater, surface water, or storm water the may be present.
- "Sewage" shall mean a combination of the liquid and water-carried waste discharged from the premises.

Waste Type

- "Holding Tank Waste" shall mean any sanitary waste from holding tanks or chambers such as are used in connection with boats, chemical toilets, campers, trailers or other isolated facilities from which sanitary wastes emanate. This definition includes sanitary wastes from septic tanks.
- "Sanitary Sewage" shall mean sewage containing water-carried waste contributed from premises by reason of human occupancy.
- "Commercial Waste" shall mean wastes admissible to the wastewater treatment system from non-manufacturing operations such as restaurant grease traps, vehicle washes, treatment plant sludge, and others as approved by MSD.
- "Industrial Waste" shall mean the wastes admissible to the wastewater treatment system from industrial manufacturing processes, trade or business; or from the development, recovery, or processing of natural resources, as distinct from sanitary sewage.

User

- "User" shall mean any person that discharges, causes, or permits the discharge of wastewater into a public sewer.
- "User Classification" shall mean the identification of a user as to the type of premises from which wastewater is discharged. Such classification shall be assigned by the District and shall include residential, industrial, public and commercial user.
- "Service Area" shall mean the local jurisdiction designated by the Board to which the services of the wastewater treatment system are provided by MSD.

User Classification

- "Residential User" shall mean any single- or two family housing unit.
- "Commercial User" shall mean any and all users of the wastewater treatment system not otherwise classified.
- "Industrial User" shall mean any user that discharges industrial waste.
- "Public User" shall mean any user that discharges waste solely from public use of the facility.

Compatible Pollutant

• "Compatible Pollutant" shall mean: biochemical oxygen demand, suspended solids, pH, and fecal coliform bacteria plus additional pollutants identified by the Director if the treatment works, in fact, does remove such pollutants to a substantial degree. The term substantial degree is not subject to precise definition, but generally contemplates removals in the order of 80 percent or greater. Minor incidental removals in the order of 10-30 percent are not considered substantial. Examples of the additional pollutants that may be considered compatible include: Chemical oxygen demand, Total organic carbon, Phosphorus and phosphorus compounds; Nitrogen and nitrogen compounds; Fats, oil and greases of animal or vegetable origin (except as prohibited where these materials would interfere with the operation of the wastewater treatment works).

Rules & Regulations

- Article XIV
 Disposal of Holding Tank Wastes
- Article XV
 Industrial Waste

Article XIV Disposal of Holding Tank Wastes

- Section 1401 General Rule
 - Only sanitary wastes from with DSA.
- Section 1402 Geographic Restrictions
 - Sanitary wastes from outside DSA require prior written approval.
- Section 1403 Permits
 - MSD provides application forms for potential Permittees.
- Section 1404 Fees
 - All rates are set by Board.
- Section 1405 Discharge Restrictions
 - All non-sanitary wastes require prior written approval.

Section 1401 General Rule

Holding tank wastes originating within the District Service
 Area may be hauled to and discharged into the District's
 wastewater treatment system only at locations, by such
 methods, and at such times and days as are designated by
 the Director.

Section 1402 Geographic Restrictions

Holding tanks wastes originating outside the District Service
 Area are prohibited from being discharged into the
 District's wastewater treatment system without prior written
 approval from the Director.

Section 1403 Permits

Permits for discharge of holding tanks wastes shall be obtained on application forms furnished by the Director. A separate permit shall be obtained for each tank vehicle upon payment of a fee specified in Section 2501. Each permit shall be displayed at all times on the vehicle for which purchased. Permits are transferable only when the tank vehicle for which the permit was purchased is to be replaced, and then only with the approval of the Director. The term of the permit shall extend from January 1 through December 31 of a calendar year. The permit fee shall not be prorated.

Section 1404 Fees

• The costs of the disposal of holding tank wastes are to be paid by the discharger. The Board will set the specified rate to reflect costs of program elements, including but not limited to, administration, treatment, laboratory and enforcement, at rates established by resolution of the Board. Any person discharging holding tank or grease trap wastes into the wastewater treatment system of the District shall pay the District at the rate specified in Section 2501 as a sewage disposal charge.

Section 1405 Discharge Restrictions

No person discharging holding tanks waste into the wastewater treatment system of the District, shall discharge or cause to be discharged, either directly or indirectly, industrial wastes without the prior written approval of the Director. In any case, wastes are prohibited which cause the wastewater treatment plant to fail to meet the effluent limitations set by the State or Federal regulatory agencies. The District may inspect any vehicle disposing of holding tank wastes at any time. The District will sample the contents of each disposal. Any costs incurred by such sampling and analysis shall be charged to the Permittee unless otherwise determined by the Director.

Article XV Industrial Waste

- Section 1501 Wastewater Discharge Permit
 - All non-residential user shall apply
- Section 1502 Application
 - MSD provides application forms and issues permits.
- Section 1503 Permit Requirements
 - Permits shall contain requirements ... specified by the Director.
- Section 1504 Permit Terms and Conditions, Appeals
 - The Permittee has a right to settlement conference or an appeal.
- Section 1535 Hauled Pollutants
 - Hauled pollutants only by Special Wastewater Discharge Permit.

Waste Hauler Application

15. Check all types of wastes discharged into the designated MSD disposal facility. You must differentiate between wastes generated inside the District Service Area (DSA) of the MSD and waste generated outside the DSA. (DSA = District Service Area)

•	Sanitary Wastes	Inside DSA	Outside DSA
•	Portable Toilets		
•	Residential (single or two family housing unit)		
•	Commercial housing (multiple family unit)		
•	Commercial business (retail, office, etc.)		
•	Public buildings (school, office, etc.)		
•	Commercial Wastes	Inside DSA	Outside DSA
•	Restaurant grease traps (Food consumed on the premise)		
•	Carwash (vehicle exterior only)		
•	Utility chambers (telephone, electrical, etc.)		
•	Coin operated laundry		
•	Commercial WWTP (wastewater treatment sludge)		
•	Public WWTP (wastewater treatment sludge)		
•	Water Treatment Plant Sludge		
•	Wastewater Pump Stations		
•	Industrial Wastes	Inside DSA	Outside DSA
•	Waste from the processing or handling of any of the following:		

- Automotive servicing, Battery manufacturing and recycling, Building products, Carbon black, Cement, Coal, Coil coating and can making, Dairy, Electroplating, Explosives, Feedlots, Fertilizer, Food, flavorings or ingredients, Fruits and vegetables, Glass manufacturing, Grain, Hospitals, Ink, Inorganic chemicals, Iron and steel, Laundry, Leather, Meat, Metal finishing, Metal products and machining, Minerals, Nonferrous metals, Ore and basic materials, Organic chemicals, Paint, Paving, Pesticides, Petroleum, Pharmaceuticals, Phosphate, Photographic, Plastic, Power plant waste, Pulp and paper, Rubber product manufacturing, Soap and detergents, Sugar, Synthetic fibers, Textile mills, Timber, any other source not classified above.
- The applicant must obtain a Special Hauled Waste Permit to discharge industrial waste. Generators of industrial wastes must obtain a
 Hauled Waste Generator Permit. Both permits may be obtained from the Division of Industrial Waste.

Waste Hauler Application

Applicant agrees to comply with the terms and conditions of the hauled waste discharge permit issued to the successful applicant by the MSD. By general permit, MSD R&R authorize the discharge of sanitary wastes originating in the District Service Area (DSA). All other wastes, including sanitary wastes originating outside the DSA, require a Special Hauled Waste Permit. The terms and conditions of the Special Hauled Waste Permit will require certain generators to obtain a Hauled Waste Generator Permit. MSD will authorize the successful applicant to purchase discharge tickets. By presentation of these tickets the permitted waste hauler certifies that both the source and the content of the wastewater discharged by use of the ticket are authorized by the MSD R&R or by Special Hauled Waste Permit and are compatible with MSD's wastewater treatment operations. The wastewater may not contain prohibited substances, materials, waters, or wastes and must not contain RCRA Hazardous Waste. All discharge tickets must legibly identify the physical location or address of the source of the contents. Failure to furnish the required information or furnishing incomplete or inaccurate information on any ticket submitted for the discharge of liquid wastes to the MSD system may result in cancellation of the permit hereby applied for and /or enforcement action as permitted under Article XXII of the MSD "Rules and Regulations".

20.	Signatory acknowledgement of agreement:				
	State of Ohio () County of <u>(ler mont</u>				
	The applicant (applicants) representing himself (themselves)				
	Kichwel W. Anderson Fresident				
	(Printed name and title of Responsible Official)				
	Responsible Official" shall for a corporation be a responsible corporate officer, or the manager of facilities having more than 250 employees or gross annual sales or expenditures exceeding \$25 million in second-quarter 1980 dollars, provided signatory authority has been assigned to the manager, for a partnership, a general partner; for a sole proprietorship, the proprietor, or a duly authorized representative of the general partner or proprietor, provided that the authorization is in writing, the party authorized has overall responsibility for operations or environmental matters, and the written authorization has been submitted to the Department.				
	being duly sworn, depose(s) and say(s) that the foregoing statements subscribed by him				
	(them) are true to the best of his (their) knowledge and belief.				
Jahren. Censer					
	Signature of Responsible Official				
	Subscribed and sworn to before me this 22 day of June 202				
	Notary Public Ottles Notary Public State of Class				
	My Commission expires: 10-1-11				

Special Hauled Waste Permit

- Issued to the business for up to three years.
- All permitted businesses must be registered with the Secretary of the State of Ohio
- This permit is separate and in addition to permits issued to vehicles
- Managed by the Pretreatment Program

A. General Conditions

- 1. The Permittee shall comply with the MSD Rules and Regulations or with federal regulations if more stringent. (Sections 204 and 402)
- 2. The Permittee shall allow MSD and any accompanying EPA personnel access to the all vehicles, premises, or other areas for inspection or sampling related to conditions of this permit. (Sections 1405, 1507, 1508 and 2101)
- 3. The Permittee shall promptly report to MSD any changes in locations, industrial processes, discharges (quantity or quality), Responsible Official, MSD contact person or chemical storage procedures. (Sections 1503 and 1506)

A. General Conditions

- 4. The Permittee shall notify MSD immediately in the event of any accident, negligence, or other occurrence having a reasonable probability of causing a discharge to the public sewer system of any wastes not authorized by this permit; notifications shall be made immediately by telephoning MSD at 513-557-7000, 8:00 a.m. to 4:30 p.m., Monday through Friday and 513-244-5500 at all other times. Within 15 days of the date of any such occurrence, a detailed written statement describing the causes of the discharge and the measures being taken to prevent its future occurrence shall be submitted by the Permittee to MSD, addressed to The Metropolitan Sewer District, Division of Industrial Waste, 1600 Gest Street, Cincinnati, OH 45204. (Sections 1525 and 1526)
- 5. The Permittee shall discharge wastewater in conformance with the information contained in the permit application on file with MSD. (Section 1403 1501 and 1502)

A. General Conditions

- 6. MSD may refuse to accept any waste at its sole discretion without prior notice. MSD may limit any wastes originating from outside the District Service Area at its sole discretion without prior notice.
- 7. The Permittee shall comply with the Hamilton County General Health District Household Sewage Code Regulation 529. Sewage Tank Cleaners, as defined in Section 529.01 UU, shall obtain registration as required in Section 529.08.
- 8. This permit is only effective with a current tank vehicle permit obtained from the Wastewater Engineering Division of the Metropolitan Sewer District.
- 9. The Permittee shall timely pay all service charges, sampling fees, permit fees and costs of any work required to clear and/or repair wastewater treatment works affected by the user's discharge or operations.

B. Prohibitions

- The Permittee shall only discharge wastes that are compatible with the Wastewater Treatment System. (Section 1513 and Section 1518)
- 2. The Permittee shall not discharge solid waste to MSD. Nor shall the Permittee discharge Resource Conservation and Recovery Act (RCRA) regulated wastes. (Section 1405)
- 3. The Permittee shall not discharge any wastes classified by the Title 40 Code of Federal Regulations 437 Centralized Waste Treatment category to MSD.

C. Limitations

- 1. MSD shall approve all wastestreams the Permittee proposes to discharge. MSD will approve compatible pollutants only and may do so at its sole discretion.
- MSD, where it deems necessary, may issue Wastewater
 Discharge Permits to generators of Commercial and Industrial
 Waste hauled under this permit. The Permittee shall only
 discharge industrial wastes that are generated by a holder of
 a Hauled Waste Generator Permit. (Section 1535)
- 3. The Permittee shall maintain the pH of its wastewater discharged to the MSD sewer system within the range of 6 to 10 standard units at all times in compliance with Sections 1518 (F) of the MSD Rules and Regulations.
- 4. The Permittee shall not discharge to the MSD sewer system waste with concentrations of metal, cyanide, phenols, and oil and grease pollutants above allowable levels in compliance with Section 1517, Table 1517-2 of MSD Rules and Regulations.

D. Requirements

- 1. The Permittee shall provide a sample of every discharge according to procedures established by MSD. (Section 1405)
- 2. The Permittee shall legibly complete each waste ticket submitted to MSD with factual information for any discharge to MSD.
- 3. The Responsible Official or an MSD approved alternate of the Permittee shall sign each waste ticket for any discharge to MSD. (Section 1532, Article I Definitions)
- 4. The Permittee shall record the date, time, location, customer name, address, and telephone number, type and subtype of load, service area of origin and discharge destination for each load of liquid waste.

D. Requirements

5. The Permittee shall maintain records of each liquid waste collected. The Permittee shall retain these records so that on any day the Permittee will have on hand and immediately available for inspection records for the previous 365 days. The Permittee must provide MSD with an address where the required records are maintained and available for inspection. The Permittee shall retain and preserve for no less than three (3) years, any records, books, documents, memoranda, reports, correspondence, and any and all summaries thereof, relating to monitoring, sampling, and chemical analyses made by or on behalf of said Permittee. (Section 409)

D. Requirements

- 6. The Permittee shall document each wastestream accepted for discharge to MSD in the Wastewater Discharge Permit Application on file with the Division of Industrial Waste. In the event that additional wastestreams are accepted, the Permittee shall amend the Wastewater Discharge Permit Application by means of written notice to the Division of Industrial Waste. The notice, laboratory characterization, and treatment plan shall be submitted prior to the date of discharge of the wastestream.
- 7. The Permittee shall discharge only at the MSD approved waste receiving station located at the Mill Creek Wastewater Treatment Plant, 1600 Gest Street, Cincinnati, Ohio 45204. (MSDR&R 1516).

E. Reporting

1. The Permittee shall submit monthly reports summing counts of tickets, the type and subtype of ticket, and service area of origin to MSD, Division of Industrial Waste by certified or registered U.S. Mail within 15 days of the last day of the month in which the ticket was submitted. Alternatively reports can be hand delivered to 1081 Woodrow Street, Cincinnati, Ohio 45204. The Permittee shall use the form provided by MSD or a reasonable facsimile for the required report. Mail reports to Chris Hall PE, 1600 Gest Street, Cincinnati OH 45204. The report may be faxed directly to MSD at 557-7050 to the attention of Chris Hall (513 557-7011) to meet the 15-day deadline, however, the original report with original signature must be sent by U.S. mail. Failure to submit an original report without an original signature constitutes a violation of this provision.

E. Reporting

- 2. The Permittee shall provide in a timely manner any additional relevant information requested by MSD.
- 3. In the event that the Permittee does not haul liquid waste to a Metropolitan Sewer District controlled discharge point during a reporting period, the Permittee shall submit a report on the MSD monthly report form certifying to MSD that no wastes were hauled or discharged to MSD during the reporting period.

F. Waste Management

- 1. The Permittee shall completely pump each restaurant grease trap at each servicing at a minimum this shall include opening all access ports, pumping the trap dry, scraping the trap and power washing the trap when weather allows. Furthermore the Permittee shall remove all old grease and thoroughly clean the outlet structure.
- 2. The Permittee shall separate all sand interceptor grit (carwash pit, utility chamber, etc) from the liquid waste prior to discharge. The Permittee must have an on-site grit removal pretreatment system and shall not discharge grit to the MSD system.
- 3. MSD reserves the right to restrict the disposal of portable toilet and other wastes to minimize odors at MSD facilities.

Regulation

- Applications, Permits, Self Monitoring Reports
- Regular observations of discharges
- Interview the drivers
- On-site review of paperwork
- Inspect the result of their work especially grease interceptors

Enforcement

- Notice of Non-Compliance for every infraction
- Notice of Violation for accumulated infractions with a Remedial Action Plan tailored to the offender and offense
- Administrative Orders requiring addition reporting steps and payment of penalties
- Cease and Desist lock the gate, revoke their permit, forfeit their bond

Escalated Enforcement

- Somebody is going to jail
- Complete paper trail
 - Notarized applications
 - Signatures on tickets
 - Signatures on monthly report certifications
 - On-site audits of record keeping practices
- All drivers know who to call when they are unhappy with their boss or their competition is not playing fair

New Dump Station

- Located adjacent but outside the plant
- Enclosed building for odor control
- Key card access for unmanned operation
- Prepayment system refuses entry to insufficient accounts
- Automated data collection of who, when and how much
- Daily composite sample for analysis

Added Security

- Key card system
- Video surveillance on web cams
 - At the point of entry to show truck, driver, and placard
 - At the point of discharge
- Discreet sampling linked to key card system
- Database link to PACS 2000 Pretreatment software

Hauled Waste Generators

- Increase regulation on the unregulated
- Accept more compatible waste from trusted customers
- Rely on pretreatment coordinators in the home locale of industrial generators to vouch for compliance status
- Increase rates for some waste streams

Summary

- MSD will accept holding tank waste as a public health initiative
- MSD will accept local grease trap and interceptor waste to protect the local collection system
- MSD will accept local industrial waste to promote the local economy (rate payers)
- Everything else is just business

QUESTIONS?