The Modern Sewer Use Ordinance

Government Affairs Seminar
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Drivers for Improving the SUO

- WPDES permit
  - Variances for mercury and chloride
  - EPA / DNR Pretreatment Streamlining
- Capacity Management Operation Maintenance (CMOM) Program
- Compounds of Emerging Concern
  - Intentional disposal pharmaceuticals

Fresh Eyes = Improved SUO

- New / Improved definitions
- New tools
- Better organization
- Updated citations
Why Do Communities Have SUOs?

- Law and Order
- Preserve and Protect
- It’s Required, and Expected

Louisville KY, sewer explosion, 1981
Two Common Pathways to SUO

- **Clean Water Fund Loans**
  - 50%-70% of POTWs receive loans
  - SUO is required

- **Industrial Pretreatment Programs**
  - POTWs delegated / approved by DNR

### 26 Delegated POTWs

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<th>26 Delegated POTWs</th>
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<td>Appleton</td>
<td>Kenosha</td>
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<td>Beloit</td>
<td>La Crosse</td>
<td>South Milwaukee</td>
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<td>Brookfield</td>
<td>Madison MSD</td>
<td>Superior</td>
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<td>Eau Claire</td>
<td>Manitowoc</td>
<td>WalCoMet MSD</td>
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<td>Fond du Lac</td>
<td>Marinette</td>
<td>Watertown</td>
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<td>Green Bay MSD</td>
<td>Milwaukee MSD</td>
<td>Waukesha</td>
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<td>Grand Chute / Menasha West</td>
<td>Neenah-Menasha</td>
<td>Wausau</td>
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<td>Heart of the Valley MSD</td>
<td>Oshkosh</td>
<td>West Bend</td>
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<td>Janesville</td>
<td>Racine</td>
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Introducing the New & Improved SUO

- Assist us in addressing
  - Dental mercury control
  - Chloride pollutant minimization
  - Intentional disposal of pharmaceuticals
  - Rapidly developing issues – ex. Ebola
  - CMOM, I/I programs
- Using Tools
  - Best management practices
  - Special permits / general permits
  - Unique reporting requirements
- Provides legal authorities for pretreatment streamlining
- Reorganized

SUO in 11 Chapters:
1. General provisions
2. Definitions
3. Territory of the District
4. Construction and operation of community sewers
5. Limitations on discharges to the sewers, applicable to all users
6. Pretreatment and other obligations for significant industrial users
7. Requirements for certain commercial and industrial users
8. Limitations of discharges of septage and other hauled wastes
9. Service charges
10. Billing and collection
11. Enforcement and abatement
Mercury Minimization – Dental Clinics

- Referred to WDA best management practices
- SUO Requirements
  - Clinics Shall....
    - Operate amalgam separators
    - Follow BMPs
    - Submit annual reports
    - Maintain recycling records
    - Allow District inspectors
- New Tool – General Permits
  - if our current mercury program needs adjustments

![Best Management Practices for Amalgam](image.png)
Chloride Reduction

- Infiltration and Inflow
  - Satellite Communities’ programs as means to cut road salt contributions to sewers
  - Salt storage and loading measures
- Municipal Wells
  - Tested for chloride annually
- MS4 storm water permittees
  - Provide reports of deicing activities
- Future SUO revisions?
  - Elimination of “old” inefficient water softeners?
  - Inventory / reporting of large softening systems?

Our Goal: 90 tons daily
Pharmaceuticals Reduction

- Satellite communities
  - Shall take reasonable steps in instructing medical facilities and nursing homes to cease using the toilet for disposal

- General Permits
  - To hospitals or other medical facilities, could include...
    - Pharmaceuticals management
    - Chloride / Laundry operations
    - Mercury
    - Patient decontamination
    - Hot issues / epidemics
WMD / Ebola

- 2001 (post 9/11), WMD
  - Mass decontamination
  - Agents not immediately known?
  - Fate of wastewater
- 2014 – Ebola
  - Responders decontamination
  - Treatment of patients / body fluids
- POTWs protecting their interests
  - Briefings / Research reviews
- Pushback by hospital
  - Leave patient care to us
- New SUO allows us to issue
  - Special permit, quick response
  - General permit, where existing with hospital, modify as needed
Pretreatment Streamlining

- DNR review / approval process
- District codification in SUO
  - 11 of 11 required changes
  - 6 of 7 optional changes
- Revised SUO / Permits / Procedures
- Implementation
  - Any WI programs using General Permits?
  - Best Management Practices as local limits?
Collection System (CMOM)

- All Satellite Communities shall provide the District:
  - Submit their CMOM by 8/1/16
  - Annually submit their CMAR (June 30)
- Satellite Communities’ Control of I/I
  - Excess I/I defined (4X flows)
  - Engineering studies as actionable
  - Corrective action plans may be required
- Bypass and Spill Reporting
  - DNR and District must be notified
SUO Process & Next Steps

- Public Participation
- Commission Reviews / Approval
- Associated Documents
  - Model Industrial Wastewater Discharge Permit (DNR ↔ Counsel)
  - Develop other model permits
    - Zero dischargers
    - General permits
  - Program Procedures (forms)
    - Supporting streamlining changes
- Begin Next SUO Revision Process?

www.madsewer.org/Programs-Initiatives/Pretreatment