



Industrial User Surcharge Evaluation and Re-Sampling Policy

August 2014

Introduction

Wastewater Surcharge Rates are billed to Industrial Users who discharge “high strength” wastewater exceeding “normal” wastewater standards. Because the “high strength” wastewater is more heavily concentrated with solids and organic matter than residential wastewater, it is more expensive to treat. Much of the cost associated with treating wastewater is related to the amount of solids that must be removed, the amount of chemicals that must be used and the amount of oxygen that is required to stabilize and digest the organic matter in the wastewater. Higher volumes of the industrial wastewater also place additional demands on the treatment processes. The Metropolitan Sewer District of Greater Cincinnati’s (MSDGC’s) Pretreatment Program has the following objectives:

1. To ensure that Industrial Users pay their fair share of treatment operations and maintenance costs, and
2. To enhance the District’s treatment plants’ abilities to comply with the Environmental Protection Agency’s National Pollution Discharge Elimination System (NPDES) Permits for effluent discharge requirements.

Sources and References

The District relies on the periodic collection and analyses of wastewater samples from industrial facilities. Individualized surcharges are determined for each Industrial User subject to a surcharge. These surcharges are based on site-specific sample results for Total Suspended Solids, Biochemical Oxygen Demand and Total Kjeldahl Nitrogen. Surcharge “credits” can also be generated and used to offset surcharge(s) otherwise due, if pollutant concentration is less than eighty percent (80%) of the corresponding value for normal strength sewage. Once Surcharges are calculated for Industrial Users, the Users are monitored according to an established frequency.

The Hamilton County Commissioners regularly pass resolutions detailing the surcharge rates and how fees are calculated. A link to the updated surcharge rate schedule can be found below:

[Sewer Rate Schedule](#)

Sampling Schedule

Once Surcharges are calculated for Industrial Users, ongoing monitoring is based on an established sampling frequency. The frequency of the sampling is based on the nature of the material released by the industry, the volume of the material discharged and historical data. The sampling frequency may occur quarterly, semi-annually, annually or less often.

NOTE: New Industrial Users are sampled twice the first year to establish applicability and baselines for Surcharge rates.

Sampling Methodology

Industrial Users are generally sampled for five (5) days during a typical user's business week when flow proportional samples can be collected. In circumstances preventing flow proportional sampling, MSDGC may employ one of the following methodologies:

- a. 24-hour time proportional composite sampling (in 15- to 20-minute intervals).
- b. Grab sampling.

Rate Disputes

While Industrial Users may dispute higher results and higher rates, the Department's findings will stand unless a reasonable explanation is forthcoming. Generally, only unanticipated system failures and/or operational upsets will be considered for re-evaluation - provided the issues are quickly resolved. The Industrial User may request additional sampling to verify its position.

Re-Sampling Requests

If an Industrial User disagrees with the Surcharge Rates, the Industrial User may request in writing additional sampling and analysis. Requests for resample must be submitted to MSDGC within 30 days of the date of the surcharge letter addressed to the Industrial User. The request must include a reason surcharge resampling is being requested and date of the original study to be re-evaluated.

If the re-sampling requires an additional monitoring event because no other monitoring or sampling is scheduled within the next 30 days, the Industrial User will be charged for the re-sampling at the District's current rates. These rates include monitoring costs as well laboratory testing and analysis costs for Biochemical Oxygen Demand, Total Suspended Solids and Total Kjeldahl Nitrogen.

If re-sampling can coincide with regularly scheduled monitoring by MSDGC, and can be conducted within the next 30 days, there is no additional charge for the Surcharge Sampling.

Requests for resampling will be accommodated as resources allow.

Study Findings and Effects on Surcharge Rates

If the re-sampling does not result in a change in the Surcharge Rate for the Industrial User:

1. The previous surcharge rate will stand as billed and the Industrial User will be charged at the newly calculated rate with the next billing cycle.

If the re-sampling indicates major changes in the strength of the wastewater, a reassessment occurs and the Surcharge Rate is re-calculated for the Industrial User:

1. The District will adjust the monthly Surcharge Rate based on these changes. Once the new Surcharge Rate is calculated, the new rate is applied to the next bill from Water Works.
2. Depending upon the nature of the temporary instance of increased strength wastewater, Enforcement actions may be initiated by the MSDGC.
3. On a case by case basis, surcharge credits and debits may be considered for exceptional incidents in which an Industrial User unintentionally and temporarily had elevated BOD, TSS and TKN values which impact the Surcharge Rate.

Recommendations

Industrial Users may choose to install or adjust their pretreatment systems to reduce above normal strength sewage and control their Surcharge fees.

Supporting Documents

- ◆ Metropolitan Sewer District of Greater Cincinnati Rules and Regulations
- ◆ Hamilton County Annual Resolution Fixing Rates for Sewerage Surcharges
- ◆ Surcharge Evaluation Standard Operating Procedure