

## Industrial Users Frequently Asked Questions (FAQs)

### **General Questions**

#### **What is the difference between individual and general permits?**

General permits are issued for categories of businesses or activities that are not highly regulated. Individual permits are issued for larger industrial users who have more specific regulatory requirements.

#### **Do I have to pay for a permit?**

MSD Compliance Services Division charges for a Pretreatment, some Hauler and One Time Discharge permits. Waste haulers that haul sanitary waste only are not charged a permit fee.

Please refer to [MSD Development Services](#) for the [schedule of fees and charges](#).

#### **What if I do not know the answer to a question?**

If unsure about the appropriate response to a question, write "unsure" or "information not available". In some cases, the questions may be answered by a simple check mark. If you have questions concerning the applications, please contact the Compliance Services Division at (513) 557-7000.

#### **What is a Batch discharger?**

Definition of Batch Discharge: shall mean a discrete quantifiable discharge of a quantity of wastewater that is a homogeneous mixture, such that a grab sample taken at any time during discharge shall be representative, that it has all the same characteristics of any other portion of the batch. The Director shall have approval of the allowable volumetric flow rate. To satisfy the MSD monitoring requirements, the discharge shall be made in accordance with a schedule approved by MSD or with a 48-hour prior notice to the Compliance Services Division.

Please refer to MSD's [Batch Discharge Requirements](#) for detailed requirements.

#### **What if I discharge more than one batch of process wastewater per day?**

If your facility discharges more than one batch of process wastewater per day (24 hours), your facility will be classified as a continuous discharger. A continuous discharger is a facility having discharge without interruptions during operating hours, except for infrequent shutdowns for maintenance, process change or other similar activities.

#### **What is surcharge and how much does it cost?**

**MSD Rules & Regulations (R&R) Section 1701:** Every person whose premises are served by a sewer connection and which discharge sanitary sewage, industrial wastes, water or other liquids--other than "normal strength sewage"--either directly or indirectly into the wastewater treatment system under the management of the District shall be charged and shall pay a wastewater treatment system Surcharge in addition to the wastewater treatment system Service Charge. The surcharge shall be determined on the basis of any combination of three constituents of the wastewater.

- A. TSS (Total Suspended Solids)
- B. BOD (Biochemical Oxygen Demand)
- C. TKN (Total Kjeldahl Nitrogen)

Additional information can be found on the [MSD Surcharge Program webpage](#).

#### **What is MSD entry policy?**

MSD entry policy is summarized in the [Right-of-Entry Notice](#) document.

#### **What is an auxiliary sewerage meter (S-Meter)?**

"Auxiliary Sewerage Meter" or "S-Meter" is defined as a meter used by commercial and industrial customers to measure water that reduces and/or increases the consumption on which to base

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sewer and effluent charges using a combination of measurements. Customers must receive conceptual approval before installing meters through an application and review process by the Metropolitan Sewer District.

For application forms and more information about the program, please visit the [Auxiliary Meter Program page](#)

### **Sewer Use Customer Application**

#### **Why do I have to fill this out?**

MSD R&R require facilities using MSD sewer system to register with the District. Additionally, if you have requested a service such as a tap permit, building permit, or deduct meter, you may be required to submit a current Sewer Use Customer Application.

#### **How do I find my company's legal business name on the Ohio Secretary of State website?**

Go to [www.ohiosos.gov/businesses](http://www.ohiosos.gov/businesses) and follow the directions for "Business Search." You can also call the Ohio Secretary of State at:

(614) 466-2655 | (877) SOS-Ohio (877-767-6446)

TTY: (614) 466-0562 | TTY Toll-free: (877) 644-6889

#### **What is Duly Authorized Representative and how do I know who that is for my company?**

MSD R&R define as:

"Authorized" or "Duly Authorized Representative" of the User.

(1) If the User is a corporation:

- a. The president, secretary, treasurer, or a vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation; or
- b. The manager of one or more manufacturing, production, or operating facilities, provided the manager is authorized to make management decisions that govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather complete and accurate information for individual wastewater or general discharge permit requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

(2) If the User is a partnership or sole proprietorship: a general partner or proprietor, respectively.

(3) If the User is a Federal, State, or local governmental facility: a director or highest official appointed or designated to oversee the operation and performance of the activities of the government facility, or their designee.

(4) The individuals described in paragraphs 1 through 3, above, may designate a Duly Authorized Representative if the authorization is in writing, the authorization specifies the individual or position responsible for the overall operation of the facility from which the discharge originates or having overall responsibility for environmental matters for the company,

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and the written authorization is submitted to the District.

### **If I have several facility operations, do I need to fill out an application for each type?**

Yes, each type of operation has unique characteristics that needs to be evaluated by MSD to ensure protection of the public sewer system and treatment works. The Sewer Use Customer Application and the appropriate additional forms should be completed. If the operations are at different addresses, then one Sewer Use Customer Application must be completed for each address.

### **Why do you need a copy of my water bill?**

Certain requirements are based on the amount of water used. The water bill provides some of this information to evaluate if any of these requirements apply.

### **How do I know if I am a “Hauled Waste Generator”?**

If MSD receives transported wastes generated at your facility by means other than site sewer discharge, then you are a Hauled Waste Generator and subject to the appropriate approval requirements. Ask your Waste Hauler where they discharge your hauled waste.

### **How do I know if I am a “Waste Hauler”?**

A Waste Hauler is a specialty company permitted by MSD to transport liquid wastes from a facility to MSD for disposal.

### **If I am a retail business, do I need to count all customers to determine the “# of occupants”?**

If you are a retail business, you should only count the employees. If you are a restaurant, you should estimate the average number of customers per day.

### **For vehicle washing, do we need to fill out the form if we don’t use any detergents or chemicals in the washing process?**

Yes. There may be contaminants of concern on the vehicle itself and these need to be evaluated by MSD. In addition, MSD needs to collect information about sand/grit interceptors, pits, etc.

### **For vehicle washing, do we need to fill out the form if all washing processes are outside?**

Yes. Some outside drainage systems still discharge to the MSD sewer system. Please note that if your company is washing vehicles outdoors, your company may be required to obtain a storm water permit. Contact the Ohio EPA directly to make this determination.

### **Would a chiropractor or a veterinarian office be considered a medical office?**

Yes. All health-related professional practices that see patients, including animals, are considered medical offices.

## **Food Service Operation**

### **How do food service operations register with MSD?**

Unlike other commercial and industrial categories that are required to submit paper forms, food services customers are required to register using MSD’s online registration portal, GovOnline. Instructions for accessing GovOnline are found on MSD’s [Food Service Customers](#) page. The link for MSD’s GovOnline registration portal is: <https://govonline.msdc.org/pub/login>

### **What is the difference between a grease trap and a grease interceptor?**

They both accomplish the physical separation and collection of fats, oils, and grease (FOG) /greases from wastewater. A grease trap is a small device installed inside a facility serving a single piece of equipment, like a three-compartment sink. A grease interceptor is a larger device serving multiple

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pieces of equipment and is typically located outside the building.

### **Is a lunchroom/break room required to have a Food Service Operation permit?**

Not necessarily. The purpose of the form is to provide MSD with facility-specific information to determine whether a permit is necessary.

### **How often should grease control devices be cleaned?**

Small under the sink or interior grease control devices or Grease Trap should be cleaned/serviced monthly and large in-ground devices or Grease Interceptor, should be cleaned/serviced at least quarterly or more frequently. See **Kitchen Best Management Practices** at MSD's [Food Service Customers](#) page.

## **Manufacturing Operations**

### **How do I determine if my facility has reasonable potential to violate pretreatment standards?**

MSD makes the final determination on this, and it is based on your company's operation procedures and MSD's experience with similar operations. In general, any facility where regulated substances could enter the MSD sewer system has the reasonable potential to violate pretreatment standards.

### **Why do you want to know the source of my water?**

Collecting information about the source(s) of incoming water will help MSD estimate the volume of wastewater discharged from your facility and proper billing.

### **What if I don't know where all the sewers are on site?**

Use your best estimate.

### **Why do you need to know what we do with our waste?**

Many wastes can cause serious operational problems or damage to MSD sewer piping, pump station, and treatment equipment if accidentally discharged to the sewer system. The information requested in the form allows MSD to evaluate the risk of accidental discharge for all wastes generated at an industrial facility.

### **How do I determine the "dry weather hydraulic or pollutant loading of the receiving plant"?**

Contact the Compliance Services Division at (513) 557-7000.

### **What are Federal Categorical Pretreatment Standards?**

These are specific wastewater regulations developed by U.S. EPA for certain industrial processes. Refer to the following link to see if they apply to your industry:

[www.epa.gov/eg/industrial-effluent-guidelines](http://www.epa.gov/eg/industrial-effluent-guidelines)

## **Waste Hauler Operation**

### **If you can get access to my records, how do I ensure confidentiality to my customers?**

Most records with customer information are not added to the public file and are only reviewed at the facility for compliance auditing. Article XV of MSD Rules and Regulations provides a Confidentiality section for such records.

### **How do I know what liquid wastes are allowed?**

MSD Rules and Regulations Section 1401 only authorizes the discharge of sanitary wastes originating in the District Service Area (DSA). All other wastes, including sanitary wastes originating

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outside the DSA, require a Special Hauled Waste Permit. The terms and conditions of the Special Hauled Waste Permit may require certain generators to obtain a Hauled Waste Generator Permit. MSD will not allow federally regulated (categorical) wastewaters, RCRA hazardous wastes, or any other prohibited substances listed in Article XV of MSD's Rules and Regulations. A copy of the MSD Rules & Regulations can be found at the following links:

[Pretreatment Program Rules, Regulations, and Policies](#)

[Full MSD Rules and Regulations document](#)

### **Can I discharge my hauled waste to the sanitary sewer inside my facility?**

No. Some hauled wastes have characteristics that could cause operational problems with the sewer system, such as blockages or corrosion. For this reason, it is critical that these compatible wastes be discharged in a controlled fashion directly at the MSD treatment facility.

### **Hauled Waste Generator**

#### **If I have my waste hauled away and I am not in the MSD service area, why do I have to submit an application?**

As the generator, you still have legal responsibility for the waste after it is hauled away. If the waste will be disposed at the MSD treatment works, then the application and analyses are necessary to make sure the material is compatible with our treatment process.

#### **If I don't have any lab analysis, do I have to have this done?**

Yes. Contact the Compliance Services Division at (513) 557-7000 if you have any questions regarding the analyses required.

#### **Why do I have to use MSD-Permitted Haulers?**

You don't have to, however only MSD-permitted haulers are allowed to discharge to MSD.

#### **Can I use my NAICS code instead of the SIC codes?**

Yes. You can also use the websites referenced below for a conversion between NAICS and SIC codes. [www.naics.com/search](http://www.naics.com/search) or [www.census.gov/naics](http://www.census.gov/naics)

### **Medical Operations**

#### **What is considered a medical operation?**

Any health-related professional practice that provides diagnostic or treatment services to patients (human or animals).

#### **Why do you want to know where my solid waste goes?**

Solid wastes other than sanitary toilet-laden wastes must be managed properly to ensure that they are not discharged into the MSD sewer system. Solid wastes can clog sewer lines and pumping stations.

#### **What do you consider "pharmaceuticals"?**

Pharmaceuticals refers to any product used by humans or animals for health reasons, including prescription and over-the-counter drugs or lotions. This would also include sample quantities.

### **Dental Operations**

#### **Why does my dental office have to fill this form out?**

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All dental offices must complete the dental form because of the U.S. EPA Dental Amalgam Rule - Code of Federal Regulations (CFR) Title 40, Part 441

### **When did the U.S EPA Dental Amalgam Rule - Code of Federal Regulations (CFR) Title 40, Part 441 take effect?**

*40 CFR Part 441* was promulgated on July 14, 2017, establishing the Dental Effluent Guidelines for discharges to Publicly Owned Treatment Works (POTW). This rule provided dental dischargers subject to the dental effluent guidelines for three years to establish compliance or no later than July 14, 2020.

### **Is my dental office exempt from this rule?**

MSD defers to the subject dental office to read this rule and determine if the exemption criteria applies. Applicability can be determined using the conditions prescribed in *40 CFR Part 441.10*. A One-Time Compliance report is required even for dental offices meeting the exemption criteria.

### **Is my dental office required to complete a One-Time Compliance report?**

Yes, while this rule establishes dental effluent guidelines for dental discharges that place or remove amalgam; *Section 441.50* establishes the reporting requirements. Metropolitan Sewer District of Greater Cincinnati (MSD) has determined that all dental offices within the district service area are required to complete a One-Time Compliance report, with a certification of compliance or exemption to this rule.

### **When is an updated One-Time Compliance report required?**

Active dental offices, unless a change of ownership takes place, will not be required to complete an updated One-Time Compliance report. In the event of a change of ownership, *Section 441.50* requires the new ownership to submit a One-Time Compliance report within 90 days of the transfer of ownership.

### **Why is the One-Time Compliance report submitted to the Metropolitan Sewer District of Greater Cincinnati (MSD)?**

As a POTW with an approved Pretreatment Program, under the guidelines established in *General Pretreatment Regulations (40 CFR Part 403)*, and the *Clean Water Act (33 United States Code [U.S.C.] Section 1251 et seq.)*, MSD serves as the Control Authority within the district service area. All Users within the District are subject to MSD Rules and Regulations, Title 40 CFR, and all other applicable local, state, and federal regulations.

## **Vehicle Maintenance Operation**

### **What is considered a Vehicle Maintenance Operation?**

Any facility performing maintenance of motor vehicles. Discharges of wastewater or other fluids from shop towel washing, service areas, repair areas, detailing areas, storage areas, painting areas, wash areas, and cleaning areas are covered.

### **If I do vehicle maintenance at an industrial facility, how do I indicate that on the form?**

For vehicle maintenance at an industrial facility, both the Manufacturing Operations form, and the Vehicle Maintenance Operations form should be filled out and submitted to MSD along with the Sewer Use Customer Application form.

## **Special Wastewater Discharge Form**

### **What is a Special Wastewater Discharge?**

This form is intended for a non-routine and short-term discharge of industrial wastewater. Because of the non-routine and short-term nature of the discharge, detailed information and analytical data are required to make sure the wastewater is compatible with the MSD sewer system and treatment works. The permit issued by MSD for this type of discharge is called a One-Time Discharge (OTD)

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permit.

### **Do I need to perform lab analysis on discharge before I get approval?**

Because of the non-routine and short-term nature of the discharge, you may not be aware of the characteristics of the wastewater. Having a suitable lab to analyze the wastewater is the only way to make sure it can be safely discharged to MSD for treatment. If you have any questions regarding the analyses required, contact the Compliance Services Division at (513) 557-7000.

### **Stormwater Form**

#### **Who needs to fill out a Stormwater Form?**

Facilities that discharge storm water to MSD's combined sewers or sanitary sewers may be required to submit this form.

## **Helpful links**

### **Metropolitan Sewer District of Greater Cincinnati (MSDGC or MSD)**

<http://www.msdbg.org>



### **MSD GovOnline portal**

[MSD's GovOnline portal login page](#)



### **MSD Rules & Regulations**

[Full MSD Rules and Regulations document](#)



### **Your Sewer Bill**

<https://msdgc.org/customers/residential-customers/your-sewer-bill>





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### Industrial and Commercial Customers resources

<https://msdgc.org/customers/industrial-and-commercial-customers>



### Waste Haulers resource

<https://msdgc.org/doing-business-with-us/waste-haulers>



### List of Permitted Waste Haulers

[https://msdgc.org/sites/default/assets/downloads/doing\\_business/waste\\_haulers/hauler\\_list.pdf](https://msdgc.org/sites/default/assets/downloads/doing_business/waste_haulers/hauler_list.pdf)



### Food Service Customers resources

<https://msdgc.org/customers/food-service-customers>



### MSDGC Surcharge Program

<https://msdgc.org/customers/industrial-and-commercial-customers/surcharge-program>



### Dental Amalgam Rule

<https://msdgc.org/customers/industrial-and-commercial-customers/us-epa-dental-amalgam-rule>

