



STATE OF IOWA

THOMAS J. VILSACK, GOVERNOR
SALLY J. PEDERSON, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
JEFFREY R. VONK, DIRECTOR

Memorandum

TO: General Assembly
FROM: Jeffrey R. Vonk, Director
DATE: January 18, 2006
RE: House File 834 Report

A handwritten signature in black ink, appearing to read "Jeffrey R. Vonk", written over the "FROM:" line of the memorandum.

Enclosed is the report to the legislature on the land application and treatment of septic tank waste required by House File 834. HF 834 was passed in the 2005 legislative session to increase the oversight of Commercial Septic Tank Cleaners. HF 834 required the Department of Natural Resources to conduct a study of the amounts of septic tank wastes (septage) collected and land applied in each county of the state. The study also asked for information about the treatment capacity at publicly owned treatment works (POTW) in regards to accepting septage

If you have any questions regarding this report please contact Brent Parker, Environmental Engineer Senior, at 515-725-0337, or Daniel Olson, Environmental Specialist, at 515-725-0346, with the Wastewater Operations Section.

Report to the Iowa Legislature
on
Land Application and Treatment of Septic Tank Waste
January 2006

Iowa Department of Natural Resources
Jeffrey R. Vonk, Director

Introduction

House File 834 was passed in the 2005 legislative session to increase the oversight of Commercial Septic Tank Cleaners. HF 834 required the Department of Natural Resources to conduct a study of the amounts of septic tank wastes (septage) collected and land applied in each county of the state. The study also asked for information about the treatment capacity at publicly owned treatment works (POTW) in regards to accepting septage. More specifically, the study asked for;

1. A county by county analysis of the amount of septage collected at sources in each county,
2. A county by county analysis of the amount of septage land applied in each county,
3. An analysis of the treatment capacity of wastewater treatment facilities in each county,
4. An analysis of the environmental impact of land application of septage, and
5. An analysis of the fiscal impact of a statewide prohibition of the land application of septage.

This report attempts to answer those questions and provide an overview of the practices and problems related to septage collection and disposal.

Method

In order to gather the required information, a survey was developed for both commercial septic tank cleaners and publicly owned treatment facilities. These surveys asked questions about the amounts of septage collected in each county and the amounts and locations of disposal of that septage. The costs associated with the disposal by land application or at a treatment plant were also requested. The treatment plants were asked whether they accept septage, charges related to accepting septage including the expenses to upgrade to accept this waste and what additional treatment capacity they may have. The survey documents are included in this report as Attachments 4 and 5.

The septic tank cleaner survey was sent to every licensed commercial septic tank cleaner, a total of 220. The treatment plant survey was sent to every permitted municipal treatment facility serving a population of 1,000 residents or more. Smaller treatment facilities were excluded because the majority of these are lagoons that should not accept septage due to the deleterious effects anaerobic septage would have on these systems. A total of 171 surveys were sent to qualified treatment facilities. These surveys were collected as returned and entered into a database for data analysis.

Results

Of the 220 surveys sent to commercial septic tank cleaners, 74 were returned for a response rate of 34%. While septic tank cleaners should have this information available, the vast majority of these septic tanks cleaners may never have been asked for this information, which may lead to a lack of these records. HF 834 now requires that the septic tank cleaners provide a septic

management plan that outlines where disposal of septage will occur. This plan will be reviewed **prior** to the license being issued to septic tank cleaners. This law will thus allow the department to establish a procedure to collect complete information on septage disposal in the future.

Of the 171 surveys sent to publicly owned treatment works (POTWs), 116 were returned for a response rate of 68%.

Due to lack of funding and time to conduct this study, the data received was not specific and detailed enough to answer all the questions requested by HF834. Following is a summary of the data and some observations:

From the data collected from the seventy-four (74) commercial septic tank cleaners who responded to the survey:

- 8.46 million gallons of septage were pumped from 81 counties;
- 3.9 million gallons of this total were collected in the seven largest counties;
- 1.77 million gallons were land applied in 46 counties;
- 6.08 million gallons (72%) were taken to 38 publicly owned treatment works;
- 90% of the septage collected in the seven largest counties (3.9 million gallons) was taken to publicly owned treatment works;
- 335,000 gallons of portable toilet waste was collected mostly in urban areas;
- 3,253 acres were reported to be used or available for land application.

From the data collected from the 116 operators of publicly owned treatment works:

- 35 (30%) plants accept septage;
- The average dump fee per load at these plants was \$54;
- Nine plants reported dumping authorization fees that averaged \$162 per year;
- 54% of plants indicated having additional treatment capacity available for accepting septage;
- This additional capacity amounted to 8.6 million gallons per month (including 4.5 million gallons per month at the Des Moines (WRA) treatment plant);
- \$29 million would be needed to increase treatment capacity at the plants that currently do not take septage.

The above information is presented graphically in Attachments 1-3.

Discussion

Due to the low survey response rate from commercial septic tank cleaners, an exact county-by-county analysis of the amounts of septage collected in each county cannot be provided. The survey results provided above give an idea of the amount of activity around the state. As would be expected, the majority of septage is collected near urban areas. This may be a result of the majority of septic systems being located in rural subdivisions near larger cities where more residents have tanks pumped regularly. The U. S. Environmental Protection Agency estimates that 50% of septic system installations occur in these urban fringe areas. It also may be that the larger urban septage pumpers were more likely to respond to our survey. Rural septic systems are typically installed as the result of a complaint or time-of-sale inspection. Attachment 1 shows the amounts of septage reported to be collected in Iowa counties. Those counties that are blank

had no reported pumping of septic tanks. Even in those counties that have amounts reported, this amount cannot be assumed to be the total amount for the county and is likely under-reported. Extrapolating from the information provided would be statistically erroneous. Nevertheless, Attachment 1 does provide an idea of where the bulk of the septage is collected.

Poor survey response also diminishes the ability to accurately portray the amount of septage land applied in each county. The most striking statistic dealing with land application is that most septage is being taken to publicly owned treatment works (POTWs) already with only 28% of the reported amounts collected being land applied. This is even more pronounced in the most populated counties where 90% of the septage reported to be collected is taken to POTWs. All of the wastes from portable toilets were reported being taken to POTWs. The amounts of septage reported to be land applied in Iowa counties is illustrated in Attachment 2. These amounts reported are also likely under-reported. Smaller, part-time pumpers in rural counties may have been less likely to reply to our survey. However, when the Attachments are looked at in conjunction with one another, a pattern emerges. The urban areas show very little land application as do some areas where there were numerous POTWs that accept septage. This hypothesis is supported by comments from commercial septic tank cleaners who voiced a dislike for the practice of land application and a preference for dumping at treatment plants when available. Septic tank cleaner comments are included as Attachment 6. Availability is the key since it is not cost effective for a tank cleaner to drive many miles to dump at a distant POTW.

Response to the POTW survey was excellent with a response rate of 68%. Only 30% of the respondents reported accepting septage. Cities that accept septage were tabulated from both surveys. A map with the cities that accept septage is included in this report as Attachment 3. Only those treatment plants that currently accept septage reported any additional capacity. Those treatment plants reported an additional capacity of 8.6 million gallons per month. The Des Moines (WRA) treatment plant accounts for more than half of this additional capacity at 4.5 million gallons per month. As can be seen from the attached map, the cities that accept septage are generally larger cities and are spread unevenly around the state. Some areas have many POTWs to utilize while some have none. An exact figure on additional treatment capacity in each county cannot be provided. From the information provided, an estimated 60 counties or more do not have any additional treatment capacity at POTWs. It is also possible that some of these counties could be served by a POTW in an adjacent county.

To assess the environmental impact of land application, the amount of septage land applied and the amount of land reported to be used for that land application must be examined. The amount of septage reportedly land applied is 1.77 million gallons. The amount of land reported to be used for land application was 3,253 acres. This gives an application rate of 544 gallons per acre per year. This is far below the maximum allowable amount of 30,000 gallon/acre/yr (IAC567-Chapter 68). It is fairly common practice in rural areas to land apply the septage from a farmstead on that farmer's property. This practice would also serve to diminish the environmental impact of land application provided the septage is land applied properly. Proper land application procedures dramatically reduce the environmental and public health impacts of the land application of septage. The addition of lime to increase the pH to 12 renders many of the pathogens inactive. Proper land application site selection, application rates and adherence to separation distances provide environmental protection for state waters. When necessary, incorporation within 48 hours further reduces environmental impact. House File 834 and the

rules that result from it will provide better oversight of these practices and ensure that land application of septage does not negatively impact the environment.

The fiscal impact of a statewide prohibition can only be estimated based on the information received from the survey. Assume the entire 1.77 million gallons of septage that was land applied was taken to treatment plants where the average dump fee is \$54. These dump fees ranged from \$25 to \$170. With an average septic tank size of 1,000 gallons, this would be 1,770 septic tanks pumped. At \$54 per load to dump at a treatment plant these additional loads would cost homeowners \$95,580. The cost will rest with homeowners because any additional costs to the commercial septic tank cleaner will be passed on to the customer (homeowners). With only one-third of the pumpers responding to the survey this figure can be expected to be one-third or less of the total additional costs passed on to homeowners. A further increase in cost can be assumed from any annual fees that the POTWs may charge the commercial septic tank cleaner. Only nine of the 116 treatment plants which responded to the survey indicated they charged annual fees. Those fees averaged \$162. This fee averaged out over the number of tanks pumped by any individual septic tank cleaner may only amount to a slight overall increase in costs.

The cost to pump a septic tank differs widely across the state. These costs range from about \$80 to \$300. If all septage was required to be taken to POTWs, it would be expected that these pumping costs would increase between \$25 and \$170 depending upon where the septage is taken. Costs on the high end of this scale would be considerable and could discourage homeowners from pumping their septic tanks.

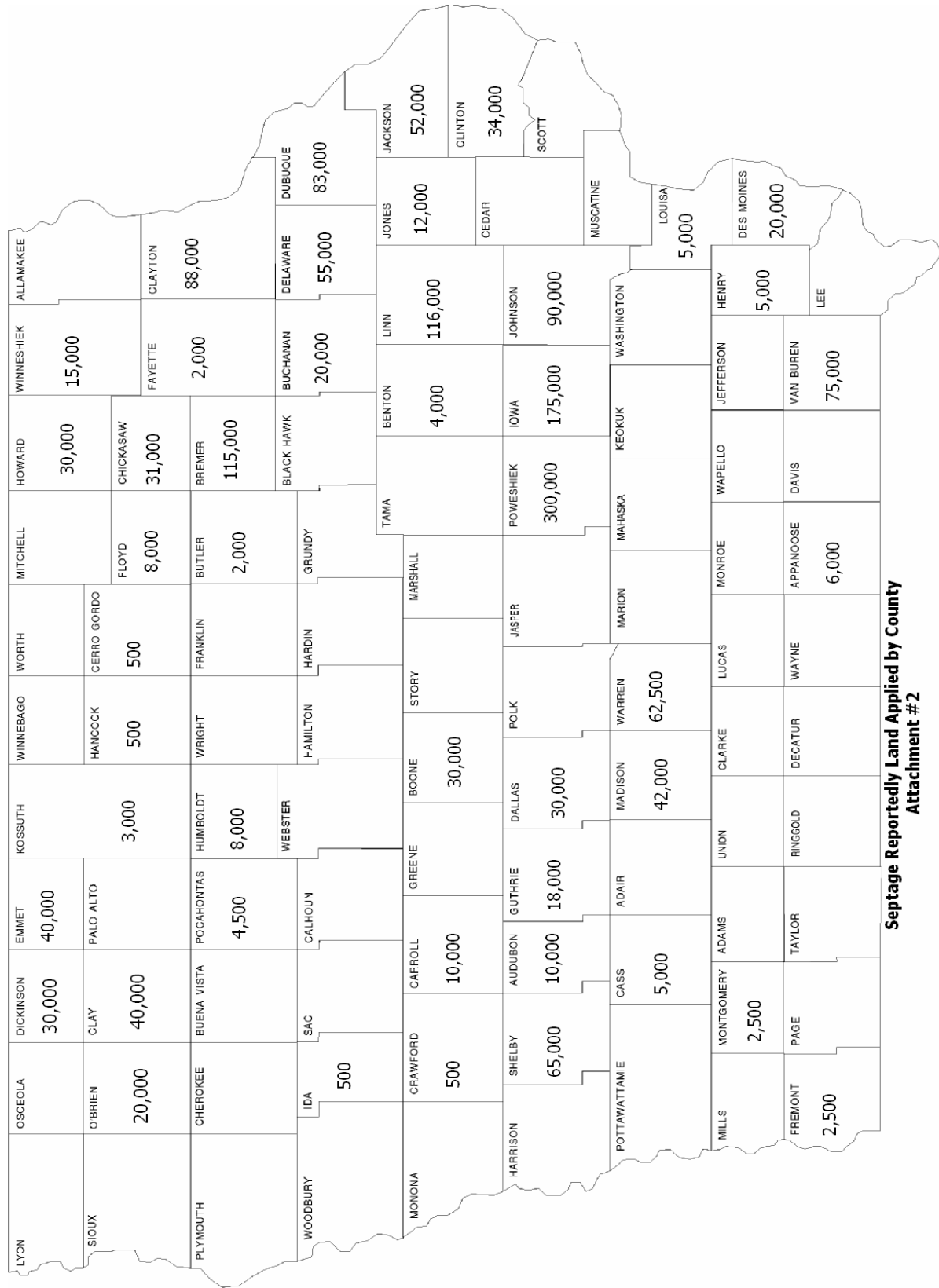
The survey sent to the POTW operators asked what costs might be associated with upgrading their facility to accept septage assuming they would be required to do so with a ban on land application. Many treatment plant operators indicated an estimate of these costs is difficult without knowing the amounts or strength of the septage to be accepted. Still, many operators provided dollar amounts to upgrade facilities to accept septage. The total amount reported to be needed to upgrade these facilities to accept septage was \$29 million.

DNR Opinion Summary

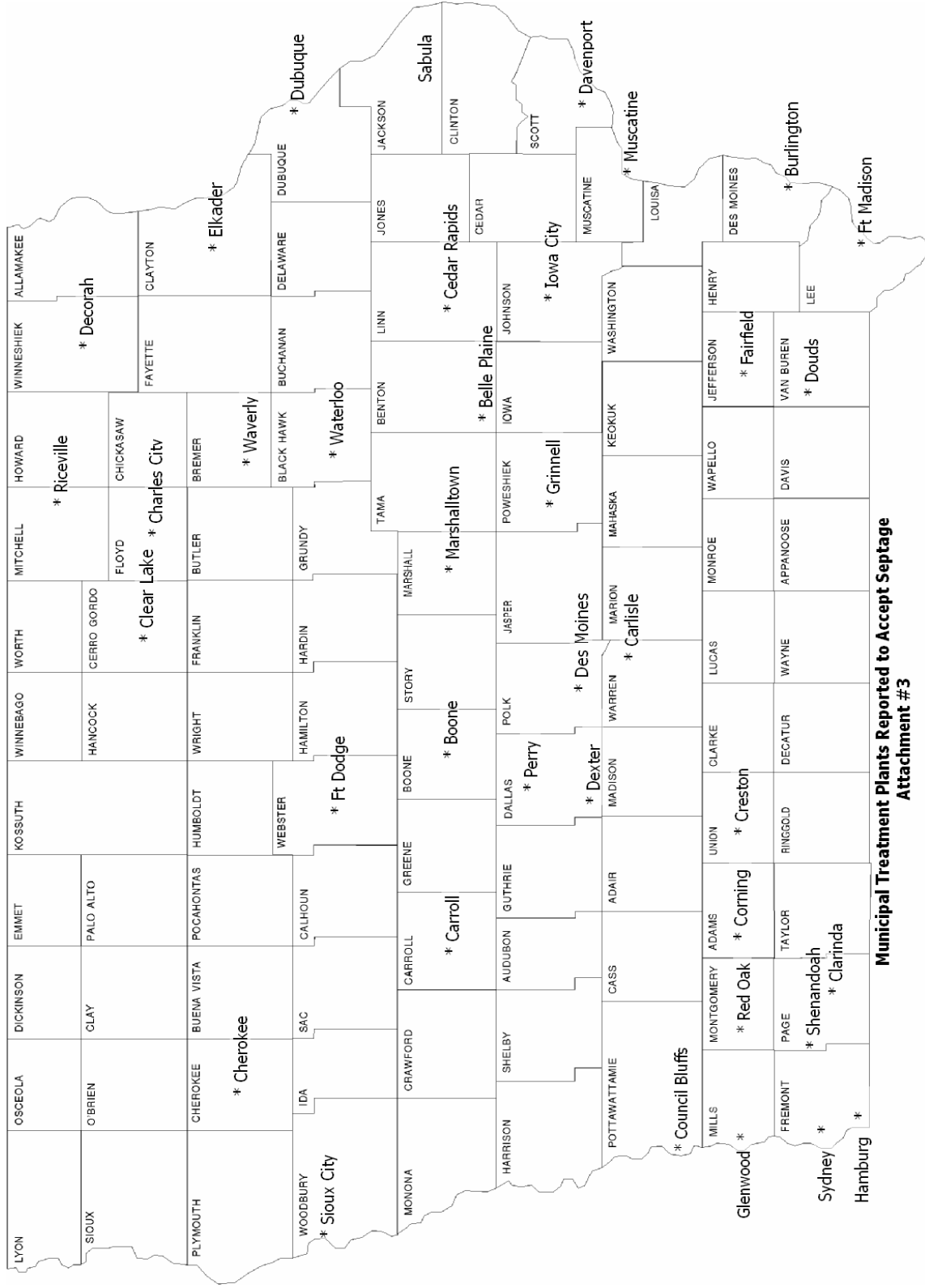
Available capacity does not appear to be a problem where publicly owned treatment works (POTWs) accept septage disposal. Many POTWs do accept septage and most tank pumpers actually prefer to take the septage to these plants as opposed to land application. Where POTWs accept septage the cost does not appear to be prohibitive. However there are large areas of the state where no POTWs accept septage. From comments on the returned surveys, it is noted that many of these plants are adamant about not accepting septage for various reasons, some related to plant capacity or treatment system upset. POTWs comments are included as Attachment 7. In these areas, banning land disposal would require significant investment in facility upgrades to provide capacity for septage disposal. At this time, there is insufficient information to provide specific fiscal impacts or even which counties would be impacted. The Department is in the process of revising and updating its rules on septic tank cleaner regulations. The intent is to implement HF 834 and to ensure land applications would result in minimum negative environmental impact.

LYON	OSCEOLA	DICKINSON	EMMET	KOSSUTH	WINNEBAGO	WORTH	MITCHELL	HOWARD	WINNESHIEK	ALLAMAKEE
15,000		30,000	40,000	3,000	WINNEBAGO	WORTH	MITCHELL	HOWARD	WINNESHIEK	ALLAMAKEE
	O'BRIEN	CLAY	PALO ALTO		HANCOCK	CERRO GORDO	FLOYD	CHICKASAW	FAYETTE	CLAYTON
105,000	34,000	40,000		2,500	2,500	15,000	45,000	57,500		
	CHEROKEE	BUENA VISTA	POCAHONTAS	HUMBOLDT	WRIGHT	FRANKLIN	BUTLER	BREMER		
240,000	56,000	24,000	14,500	8,000			21,500	132,000	2,000	136,000
	WOODBURY	IDA	CALHOUN	WEBSTER	HAMILTON	HARDIN	GRUNDY	BLACK HAWK	BUCHANAN	DELAWARE
500,000	7,500	20,000	60,000	48,000			17,000		20,000	56,000
	MONONA	CRAWFORD	GARROLL	GREENE	BOONE	STORY	MARSHALL	TAMA	BENTON	LINN
200,000		500	22,000	5,000	30,000		103,000	30,000	63,000	424,000
	HARRISON	SHELBY	AUDUBON	GUTHRIE	DALLAS	POLK	JASPER	POWESHIEK	IOWA	JOHNSON
15,000	52,000	20,000	23,000	65,000	97,500	30,000		220,000	260,000	2,459,000
	POTTAWATTAMIE	CASS	ADAIR	MADISON	WARREN	MARION	MAHASKA	KEOKUK	WASHINGTON	MUSCATINE
	199,000	10,000	5,000	73,000	55,000	5,000	50,000	10,000	2,000	120,000
	MILLS	MONTGOMERY	ADAMS	UNION	CLARKE	LUCAS	MONROE	WAPELLO	JEFFERSON	HENRY
330,000	60,000	3,000	57,000	1,000				17,000	15,000	30,000
	FREMONT	PAGE	TAYLOR	RINGGOLD	DECATUR	WAYNE	APPANOOSE	DAVIS	VAN BUREN	LEE
102,000	78,000	5,600			6,000	17,000	51,000			

**Septage Reportedly Collected in Each County
Attachment #1**



**Septage Reported Land Applied by County
Attachment #2**



**Municipal Treatment Plants Reported to Accept Septage
Attachment #3**

Attachment 4

Septage Pumpers' Survey

1. Approximately how much septage (in thousand gallons, K) do you pump from septic tanks and/or aerobic treatment units annually?	_____ K gallons
2. List the counties where you service septic tanks, with the approximate septage pumped from each per year.	_____ County _____ K-gal. _____ County _____ K-gal. _____ County _____ K-gal. _____ County _____ K-gal.
3. If some or all of the septage you haul is land applied, estimate the amount of septage land applied in each county where it is applied.	_____ County _____ K-gal. _____ County _____ K-gal. _____ County _____ K-gal.
4. If you own your own land for application how much land do you own?	_____ acres
5. If you do not own your own land do you have to pay for land disposal and how much?	\$ _____ per K-gallon \$ _____ per acre
6. If you take any septage to a public treatment plant (PWT), estimate how much you take to each named public treatment plant.	_____ PWT, _____ K-gal. _____ PWT, _____ K-gal. _____ PWT, _____ K-gal.
7. How much do they charge per thousand gallon to dump and/or for an annul permit to dump?	_____ PWT, \$ _____ /K-gal, \$ _____ /yr. _____ PWT, \$ _____ /K-gal, \$ _____ /yr. _____ PWT, \$ _____ /K-gal, \$ _____ /yr..
8. Which other cities are you aware of that will accept septage in your area? What do they charge?	_____ PWT, \$ _____ /K-gal, \$ _____ /yr. _____ PWT, \$ _____ /K-gal, \$ _____ /yr. _____ PWT, \$ _____ /K-gal, \$ _____ /yr.
9. Do you service "port-a-potties"? If so what volume of waste do you handle per year?	No ____, Yes, _____ K-gal/yr.
10. Where do you take the "port-a-potty" waste and what is the charge?	_____ PWT, \$ _____ /K-gal, \$ _____ /yr. _____ PWT, \$ _____ /K-gal, \$ _____ /yr. _____ PWT, \$ _____ /K-gal, \$ _____ /yr.

Please make any other comments about the environmental and fiscal impact of this law change:

Attachment 5

Wastewater Plant Survey

1. Do you accept waste from septic tank septage transporters?	___ Yes ___ No
2. If so, how much do you charge?	\$_____/1000 gallon, \$____ annual license fee
3. If legislation was passed that required you to accept septic tank waste, would your treatment facility be able to handle the additional loads?	___ Not without facility upgrading ___ Yes, _____,000 gallons/month
4. If you currently cannot accept septage, estimate the cost to upgrade your facility to do so.	\$_____
5. If you can not currently accept septic tank waste, after upgrading, estimate what you would have to charge a septic pumper to dump at your facility.	\$_____/1000 gallon, \$____ annual license fee

Please make any other comments on the environmental and fiscal impact of this law change:

Attachment 6

Septage Pumper's Survey Comments

The impact of the law will mean a higher cost being passed on to the customer. It is a good thing to have the oversight of land application as our environment and sanitation of, is very important. Also education of the public is needed about land application.

Jim McCaughy, owner, Jim's Johns.

Town's with lagoons won't let me dump in their sewer. So if you would make them take it I would be glad to pay dumping fees. Walker, Troy Mills, Quasqueton, Rowley, Urbana, Center Point.

Shermans Septic Tank Cleaning, Walker, IA

We will move our business out of the state of Iowa!

I, Randy Brown, owner of Brown's Septic Service, wants to know why Davenport makes it so hard to get permission to dump waste from septic tanks there. I've tried before to get information about getting permission to dump there but no one has ever contacted me back offering assistance. Please help me in getting some information because I am expanding and getting more business in Iowa now and would like to dump there if possible. I am also the distributor of Clearstream aeration systems for this area now, and I can service these aeration systems if needed for potential customers who need an aeration system installed. If you can put my company on the list for aeration system services representatives for Clearstream it would be greatly appreciated. Please keep me informed about anything new to the Davenport, IA area. Thank you.

Randy Brown

Prohibition of land application of septage has and will over burden the public treatment plants. Loss of nutrients better utilized by the soil and ground cover/crop. Higher operating costs, disposal fees will skyrocket. Increased paperwork, lost productivity (lost income), from increased hauling distance/time. Aggravation of more fees, licenses, inspections that really do nothing more than give paper pushers something to do!

Inspection of commercial truck should not apply due to DOT requirements. What regulations would apply to those who dump out of state?

I think a law should be passed that every construction site should have a portable restroom on site. This law was passed in other states and should be passed here in Iowa. This would stop the use of people's basements and going elsewhere which is a health problem.

Port "O" Jonny Inc. Hiawatha, IA

Septage is land applied on CRP soil. Testing and weed control is done by me. Also apply lime to ground to keep pH near 7.0.

I only rent and service porta-pots. I do not pump septic tanks. All waste I haul goes to PWT.

Too high dump fee.

You could get professional and call port-a-potties PORTABLE TOILETS.

We do land application by land owner permission only. We would like to use Burlington disposal but feel that their rates are too high. Therefore can't compete with out of our area. With the cost of fuel we are limited to where we go.

I would like each county sanitarian to "ok" the site for land application. The only problem with this is the owners are reluctant to get a hold of the sanitarian for fear of having to replace or completely upgrade their system. This runs into thousands of dollars. In southwest Iowa homeowners don't have that kind of money. With the limited number of acceptable areas to dump and the price of dumping, many homeowners are pumping and dumping their own tanks. Many locations are or would not be allowed. Also many unlicensed septic haulers. It would be nice if each county or counties would have a general location(s) for septic disposal. Something like in Wisconsin, they have drying beds. This in turn is laid to dry and then they sell the product as fertilizer. You can see an example of this on an episode of "Dirty Jobs" on the Discovery channel.

On a different subject some organizations or certain people are not charged the septic disposals or a lesser fee in some areas. I know your organization probably has no control over this, but as I discussed in the previous paragraph, this may reduce the problem. This directly effects our company as we are in direct competition from a company in Corning, IA. We charge less to pump, but the disposal fees he may or may not occur is less. We would like a fair playing field for all that is involved. Thank you!

Willetts & Woosley, Dan Willetts, co-owner
411 New York Ave.
Creston, IA 50801
641-782-4220

We do not haul or pump septage. We have a pre-treatment process for our facility and we haul the treated water to the POTW and are required to have a permit for that activity. Thanks.

Steve Berg
Gless Bros. Inc.
Rich Powell
Box 220
Bluegrass, IA
800-553-8052

We service 11 counties in Iowa and Illinois. These three have the majority. I do not know how much we pump in each county ,only what we dump.

While I understand rules on disposal are necessary and registration of commercial tank cleaners should continue, I do not believe added cost and more restrictions on small business is appropriate. This will force independent operators out of business thus leaving this industry in the hands of corporate America, creating more sub-standard wage jobs, while driving up cost to the consumer. As to the environment, you already require commercial cleaning companies to maintain a log book on where they clean and how they dispose of septic waste. They are further required to sample each load they dump at the wastewater treatment plant and identify place of origin.

At the same time any farmer with a honey wagon can hire out to his neighbor for a fraction of the industry rate, then indiscriminately dump without regard to treatment. I have been told that this practice happens in my area by people I tried to solicit as a customer. Work on this problem, that will benefit the environment.

We have never picked up septic or aerobic. We use the permit because we pick up gray water from our own wash facility.

I would have to drive 40 minutes to the nearest dump site/PWT. May Have a law like other states to have septic pumped minimum of 5 years, like state's of Maine, Virginia, then septic would not be as heavy or have such odor. Thanks.

Dean Margeson

I have been in the septic tank cleaning business since 1958 but as I am now 68 I do very little cleaning. All I do is a few jobs in the fall on farms only where I can dump on ground that has crop taken off. I do not know anyone that is as experienced in this field as I. We used to put in hundreds of tanks and also in the well business. I would be interested in any job in NW Iowa relating to septic tanks. All locations are different. We have the Clark Museum of Area History in Dickinson County and have thousands of pictures of the lakes area and surrounding area. I thank you for your letter.

Jerry Clark

We already make out record of pumping and disposal of all septic pumped when, where and disposed of with the Pott. Co. We turn in ours every month.

Norman Thomas

Norm's Pumping

I feel that the tanks that dump in the road ditch need to be updated and all tanks need to have a report every 5 years. I do jet-vacing too and feel that some of the towns need to update the wastewater plants too. Thanks.

Robb Harter

Any more regulations or fees will force our small septic cleaning business out of the business. Then the county can take care of everything.

Make any price increase on a percentage basis. We are a small company. Bring in about 35-40K per year. Health insurance \$450, Truck payment \$500, fuel \$1000, business payment \$2000 =

\$3950/month. I have a part time job to live on and so does my wife. If you make mandatory license fee increase, I'll probably go out of business.

I live in a small community where there are not many septic tanks to pump. Some of these laws will probably shut down the small individual. If you make the license fee for all service in section 455B-171-Code 2005. Question, Why were we not informed before the legislature passed HF834? Is our voice not important?

See attached letters for comments from Mike Killen.

All septic sludge is applied to my personal ground at 3000gal/acre.

We are not in business really, we pump our own and maybe a neighbor.
Andersen Trenching & Excavating
17263 Sumac Rd.
Honey Creek, IA 51542

Local health dept. poorly staffed to handle monitoring of this in my opinion.

We have been pumping for only 4 months and in that 4 months we have pumped pits containing sand and water. No human waste has been pumped with our truck. We have taken san/water to a PWT and they charge \$5 per 1000 gallons.

It will slowly push the small full time septic waste haulers out of business!

The laws should allow either all land application or all disposal of at treatment plants. They have made it so customers won't pay to pump tanks but will get a friend with a honey wagon to pump and dump on fields, waterways. You folks are your own worst enemies.

Why do you need to raise the fees? More government makes a better world, right?

Site plan and all paperwork on loads applied are turned in to Mr. Anderson, Warren Co. Health Dept. every six months (June 05). WRA charges haulers 17.5 cents per gallon. Some companies dump for .75 cents per gallon. That's why we haul to Dexter 45 miles away.

The town where I live has not wanted what I pump in the past. Septic tanks need to be cleaned so they work properly but I also need to dispose of them.

See attached letter for comments from Jay Lyftogt, Orange City, IA.

We are not doing any septic work at this time other than our own but want to maintain our license. C&L Construction Co. Inc.

HF 834 as written to date will adversely affect all property owners. Here in Dallas Co. it's ongoing to educate property owners of the importance of scheduled pump outs. The cost of operation and rules will always be passed on to the customer therefore retarding all our efforts to date.

City of Humboldt and Dakota City do not accept septage waste. With current fuel prices the cost of doing business has gone up a lot!

I went to Clayton County Health and Zoning and Frank Phippen passed everything I do. Do not make the rate too high. I am a small business, so don't be too hard on us.

Ludouissy Pumping
North Buena Vista, IA

I do very little septic pumping. A higher license fee and increased paperwork will probably cause me to stop offering septic pumping.

Attachment 7

Wastewater Plant Survey Comments

Difficult to determine, possibly need a holding tank to add septic tank waste slowly to the system. This could be very expensive, \$50-60K. Really do not want to take waste from transporters.

At the present time we have no one using our lagoon for this purpose. Before we could get an estimate of cost and if our facility can handle without an upgrade we would need to know how much it is used.

A dump station would have to be built. Screening and grit removal system would have to be updated. The shock load of anaerobic waste going into an aerobic system is tremendous. There would have to be a significant increase in aerobic diffusers to accomplish this type of shock load. It would not be a good idea to require plants to accept this. This needs to be voluntary for plants that have the capacity to accept it. The taxpayers of a municipality should not have to subsidize county subdivisions.

Depending on the precipitation we get through the year would determine if we could handle anymore. Some years we discharge early, some times we can wait, it just depends on the year. We just upgraded a few years ago. I don't think we could charge enough to upgrade. Depends on how much people are dumping.

I do not have any idea how much renovations would cost.

Not sure on figures. I would think that Tama would want a controlled dumping station with some way to aerate the septage. Why don't they just inject the waste to reduce vector attraction and lower human contact?

At this point our plant can accept septic because our plant is under loaded. But I can see where we would have to limit the amount of septage we would take. Another problem is the septic haulers bringing in septic waste from outside our county. Haulers should be required to haul waste to the county they collect it from.

We are too small to handle this application. City of Lisbon.

We do not take grit from car washes that have been removed by septic tank cleaners.

The fiscal impact of this law change could not be gauged in my area because of all the housing being built out of the city limits. Along with the surge in operating expenses and the lack of a strong county or regional affiliation dealing with these environmental problems.

Don't put rural problems on the cities shoulders. The city of Hull is not set up for this in a lagoon based system.

It would be nice to see the department consider fiscal impacts of other issues such as stream reclassification.

In the past we did accept septic waste from various haulers. It didn't take long to figure out how fast the septage upset our treatment facility and we no longer accept any waste from anyone. Besides we have enough problems treating our own waste!

We would only accept septic tank septage/load when each load had been tested to make sure what it contains so that it wouldn't hurt our system. Therefore, highly unlikely we would ever do or allow this. Home rule is what we stand by and to upgrade our facility and what it would cost can only be determined again, by what's in their load.

We are currently re-evaluating this issue with regards to jurisdictional issues, costing, licensing, mixed loading accountability etc, origin and content accountability. Manpower requirements to accommodate "forced" reception. Direction regarding haulers dumping loads that are obvious/sample proven harmful contents etc.

We accept very little septic tank waste each year. If a law was passed we will certainly increase our fees.

City of Eagle Grove

We are just completing a sewer improvement project that cost \$2 million. Do not know if we would need to make additional improvements. Would not want to have additional expense to make additional improvements. Until we know the cost of operating the newly improved plant and until we know if any additional improvements would be required, there is no way to estimate what would have to be charged.

We have aerated lagoons for our wastewater process and do not accept septic tank sludge. At this time septic tank sludge is taken to Grinnell waste treatment plant which is 15 miles away or Belle Plaine treatment which is 20 miles away.

I am not worried about the additional loading. Dumping anaerobic sewage out of a septic tank into an aerobic sewage plant doesn't work well. There have been too many times once you allow people to dump in your system they will sooner or later dump something that will upset your system. Now the city has the problem and expense of fixing it. We as a city have to follow the 503 and Chapter 67 rules for land applying solids. The septic haulers should continue to follow the same rules.

If dumped at the treatment plant, it makes a mess in the screening room. If dumped in the distribution system we have odor complaints.

City of Monona

Without knowing how much septic tank waste we would receive it's hard to tell if the plant could handle it and how much it could handle. Without knowing what is in the septic tanks and how much waste is in it, I do not feel that I can fill out lines 3-5 accurately. City of Sheldon
If possible, I would like to compare what other cities, that compare to us, are or will be charging for this service. If this law passes we would want to have some answers for the contractors involved.

City of Clarksville

How much grit and foreign material would be in a tank load?

Estimates are based on current DNR/EPA regulations. Upcoming regulations will probably be more costly. Plant upgrades are expected around 2010 because of population growth.

All waste around Marshalltown already comes to wastewater plant. We currently have a transported waste program and ordinance. The city does not accept waste from industrial facilities and have had requests from industrial facilities on septic systems. We did accept after extensive laboratory testing of the waste.

City of Marshalltown

Sewer rates would have to be raised to offset the upgrade costs.

May have to adopt ordinance for commercial dumping within so many miles of our town. We will have to make sure there is plenty of water flushed with the solids so we don't create a problem in our city lines. Some of the impact will depend on the number of gallons dumped per year. It May be tough to monitor the dumping site also.

We should not be required to accept wastewater that does not originate within our city limits.

I would need to research what other facilities charge for this service.

If required to accept septic tank waste upgrades would be needed to improve handling and to provide for security. Upgrades would be based on projected needs. Costs from \$30,000 to \$100,000 for equipment. These cost projections would only be required if amount of dischargers would be dramatically increased. If only limited increases then no additional expenses.

City of Dubuque

Many septic haulers combine collection to dilute or disguise non-domestic waste that they haul. It is imperative that any requirement mandating acceptance at a publicly owner treatment works (POWT) allow that POTW to reject any wastes that cannot be properly treated or that would result in enforcement/reclassification actions against the POTW. We will not accept any waste from any source that could result in our treatment facility being classified as a hazardous waste treatment or transfer facility.

Lagoon systems. N/A City of Manson. *Does not accept septic waste.*

Would accept only if it came from in town.

The city of Ida Grove wastewater treatment plant is a mechanical plant with RBC's (rotating biological contactors). We don not accept septic tank septage for we feel the shock of dumping would do harm to the system due to the shocking and killing of some critical parts of the plant. I feel it would be very difficult to treat the septic tank septage and have the plant meet effluent limitations when shocking the system like that.

Mark Nielsen, Wastewater operator

We currently provide septage services for our county and have for many years. Currently we receive about 100,000 gallons/ month. The treatment plant has already been required to issue

annual waste hauler permits in conjunction with our industrial pre-treatment program. We expect to be able to retain these fees.

Unless the generator (ie. Homeowner) and the contractor are held accountable for a plant upset, we would be unwilling to accept septage. Generators should be held accountable, the same as municipalities are for bio-solids. More tracking, documentation and testing prior to dumping would be required. This should be at the generators expense.

We do not accept waste generated outside the boundaries of the sanitary district and would not be interested or willing to accept septage at any cost. We are here to eliminate the need and usage of septic tanks, not promote their use.

Iowa Great Lakes Sanitary District
Milford ,IA

Our concern with having to accept septic waste is that there is no record where the waste is coming from or control over what is dumped into a septic system being pumped and the effect the waste could have on our plant.

These questions should be asked of a facility that has already done this. Would charge what is necessary to pay for upgrades.

Plant is close to capacity. Accept waste after certified lab tests paid by hauler. What does a septic dumping do to an aerobic facility?

We would have to come up with a way to incorporate the septic waste with our own waste and it probably would consist of adding grit removal system to deal with septic waste.

Our costs depend greatly on how much additional capacity is needed and if any inlet measurement structures are needed. Also needed is a way to calculate gallons and to charge customers.

We have only dumped a septage transporter once in the last 10 years. We have no set charge for this and only them our minimum sewer rate of \$4.80. We will have an extra capacity of about 100lbs of BOD per day after our upgrade is finished in November. However, we will still be hydraulically overloaded due to our I & I problem. From the information I have BOD is about 55lbs. per 1000 gallons and the total solids are about 285 lbs per 1000 gallons. I believe our lagoon treatment could handle 1000 gallons a day but less would be better. I find it hard to believe that the septage waste would have much of an environmental impact being ground applied compared to the large amount of factory style hog operations we have here in NW Iowa. If you believe my calculations are in error please contact me.

Larry Bailey, City of Laurens

I think that all loads from septic tanks should be further treated by a wastewater plant. The fecal coliform is much higher in raw waste from septic systems, would receive better treatment and meet land application requirements for EPA and DNR. I would be in favor of this legislation passing.

Robert Smith, Carroll WWTP

We currently do not accept septic waste because of the negative impact that it has on a wastewater plant.

Mike Lansing, City of Dyersville

The treatment plant was constructed in 2000. We would like suggestions for fees or annual license fee. We would be open to accepting septage.

We have a lagoon system. Uncertain of additional expense for treatment.

I had a conversation with Jim Stricker (IDNR) and he advised me to not accept any septage.

Currently only accept septage from the West Liberty area (1-2 mile radius).

I don't know anything about an annual license fee. Is this a DNR license? The estimate on a fee per gallon would have to be based on many factors. A guess at this point would be ridiculous.

Mandate septic waste hauled to POTW. POTW's need to increase charge to reflect/equal charges paid by properties connected to POTW. This will not only reduce urban sprawl and higher infrastructure costs in the future but will also better protect the environment and groundwater quality.

We do not currently accept septic waste but have never been asked to. If a waste hauler needed to use our facility a contract could easily be made to help both of us out.

I believe that septic tank waste should not be allowed to be land applied. I do know from experience that each WWTP needs to do testing to figure out what the equitable rate needs to be for charges. We currently take approximately 100-120 loads/yr.

We would need to get estimates from the city engineer.

City of Edgewood

The city just spent \$1.8 million to upgrade its WWTP. The city would not be in favor of upgrading to accept septic tank waste. In 25 years I have not been contacted by one septic hauler to dump waste at the city plant. Why not make larger cities, regional sewers dump waste. They are already able to handle septic waste in our area. Then the cost is already passed on to the people with the septic tanks, instead of the cities picking up the bill one more time for more state legislation passed.

Bad idea, it will overload many sewer plants since the stream rules continue to be more strict. You can't have it both ways without creating additional costs.

Larry Farly, City of Denver

We have never been asked. I would think we would have plenty of capacity to do so.

City of Guthrie Center

Price per 1000 gallons would depend on price of putting in a receiving station and maintenance of that unit. I estimate \$30-\$50 per thousand. If all septic tanks were pumper every three years the gallons per month would be big. What would you do with the rural industrial septic tank waste? I will not accept it.

Decorah WWTP

Why not require posting of septage application locations. Maybe the hunters will not crawl around in the location. Not all mechanical plants can process septic waste. Set up regional septic waste treatment centers, have the counties fund them. What ever is required agribusiness should be included!

We are a 4-cell lagoon system. Approximately 20 years ago our engineering consultants (Shive-Hattery) advised us not to accept septic tank waste. To specifically answer the above questions we would need to contract the services of an engineering firm.

If we were to accept septic wastes, charges would be \$274.40/1000 gallons. 1.5 times that for out of town wastes.

Lagoons (aerated) no sludge capabilities!

We are a small community and with larger cities around to accept this sewage, I doubt we would ever have to accept it. Doug Roelfs, City of Mediapolis

Sampling to ensure it is septage, not industrial sump wastes. Liability to haulers for contamination of treatment plants. DNR should establish a base line standard for septage so fees could be set for septage outside of the norm.

L. Klath, City of DeWitt

Most WWTP are not set up to treat septic, screening, grinding, analyzing, measure volume. Upgrading facilities would have a tremendous fiscal impact.

We only take 1 or 2 loads a week and only from our area. If we had to take more it would be a real problem with solids.

Gallons a month would depend all upon the type of waste that is dumped. We don't have many dumps and haulers go to other cities to save money.

I have only to questions. Can you limit the volume accepted and do I have the right to set rates?
Brent Wise. Michael Foods

I think regional facilities with >10 MGD and with treatment capacity should be forced to accept these wastes.

Des Moines Regional Wastewater Reclamation Facility

Accept only wastes from inside the city limits of Ankeny.