

CITY OF OAK RIDGE



POST OFFICE BOX 1 • OAK RIDGE, TENNESSEE 37831-0001

June 1, 2006

Ms. Jessica Wilcox
Service Line Inc.
2320 Zinga Drive
Reedsburg, Wisconsin 53959

Re: Parts Washer Discharge

Dear Ms. Wilcox:

This office has reviewed the information you provided concerning the characteristics of the spent parts washing solution, the MSDS for the Renegade Detergent Concentrate and the letters from different municipalities concerning the disposal of spent detergent solution into their sanitary sewer systems. You requested from the City of Oak Ridge a letter stating that an industry or commercial business could likely dispose of the spent detergent solution into the sanitary sewer without pretreatment.

You correctly stated in your email to me on May 26, 2006, that the decision of the City to allow the disposal of spent solution depends on at least two factors: the nature of the "dirt" being removed from the parts being washed and the maintenance of the part washer. A factor not noted in your correspondence but very important is the level of certain pollutants already in their waste stream from other processes within the business. Thus two different businesses could both have practically identical spent wash solutions; one would be allowed to discharge to the sewer and the other one would not.

Therefore, it is impossible for the City of Oak Ridge to state in general that all industries or commercial businesses in Oak Ridge would *probably* be permitted disposal of the spent solution from the Renegade Parts Washer into the sanitary sewer without pretreatment. For each user who utilizes the Renegade unit in Oak Ridge, permission to dispose of the spent solution would be determined after an *Industrial Pretreatment Questionnaire and Permit Application* that includes a characterization of the waste stream is received by this office. I have previously sent you the local limits for the conventional pollutants. These limits would be imposed on any discharge to the sewer as well as individually derived limits for metals, organics, phenols and CN. If an industry or commercial business were issue an *Industrial User Discharge Permit*, they would be responsible for testing the discharge waste stream at least monthly. The City of Oak Ridge would also sample the waste stream twice a year to ensure compliance with the discharge limits.

One other option exists other than the issuance of an Industrial User Discharge Permit. After the questionnaire and waste stream characterization is reviewed and it is determined that no other internal processes are contributing to the waste stream except of course domestic waste, it is possible that a letter of permission to discharge the spent solution could be granted, assuming that there were very low levels of pollutants of concern. It would be the responsibility of that business to notify the City of Oak Ridge of significant changes to their waste stream from that time forward. Some periodic sampling and analysis of the discharged spent solution by the business would be required to ensure that the specified limits were

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met. The City would reserve the right to do it's own additional monitoring as verification of the business's self-monitoring.

If you have additional questions, please feel free to contact me by phone or email. My phone number is (865) 425-1610 and you already have my email address.

Respectfully Yours,

Ken D. Glass
Environmental/Regulatory
Compliance Coordinator