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RE: OSKALOOSA FOODS - COMMENTS CHAPTER 13.08 MUNICIPAL CODE - SEWER SYSTEM

To City Council of Oskaloosa,

On behalf of, Oskaloosa Food Products Corporation (OFPC), ISG would like to formally comment on the language of the proposed ordinance Section 1. Chapter 13.08 "Sewage System".

OFPC is an existing significant industrial User (SIU) and provides pretreated wastewater to the City of Oskaloosa and as a result would like to assist in the ordinance policy. Specific comments are as follows:

1. Definitions:

#11: Definition of industrial-commercial waste

Comment: definition is broad and thus includes all commercial and industrial businesses. Ordinance should include definition to define applicability to this ordinance, like minimum volume, or statement as determined by City. Use of the federal definition of Significant industrial User is recommended.

#31: A slug discharge may be measured using a grab or composite sample.

Comment - noted earlier that a slug is defined as exceeding a duration of 15 minutes, thus slug measurement should be a minimum of 15-minute composite.

Define more clearly the 5x concentration trigger, by defining the reference levels as permit limits, not normal or average levels.

2. 13.08.032 Accidental Discharge

a. Section A: All industries shall immediately telephone the City's wastewater facility to notify them of:

i. Comment - define clearly which phone number to contact. Would prefer a method that documentation can be accessed, like an email follow up.

b. Section A2: All discharges by the industrial user that are higher strength than those occurring under normal operating conditions including production and process upsets that are not expected to be fully treated, wasting of solids from treatment systems rather than hauling wastes to the POTW digester facilities or other discharges that are not representative of normal discharge to the POTW sanitary sewer system.

i. Comment - define clearly that disposal of sludge in this instance to alternative disposal site requires approval? What defines wasting of solids? Would a spill in a production plant and subsequent waste disposal be included?

c. Section AC: Increased user charges as well as fines...

i. Comment: Define clearly what fines and user charges would be in place or specifically define in pretreatment agreement.

3. 13.08.060 Right of Entry

a. Section C -

i. Comment: Define to clarify what "document production" references.

4. 13.08.420 Collection Point for sampling

a. Section B: All industrial users shall provide, operate and maintain monitoring facilities at the user's expense.

i. Comment - this statement implies that all industrial-commercial customers are required to provide and maintain a flow-based sampling plans. This is holding the City to managing sampling for each industrial -commercial customer.



- b. Section D: The city may use sampler lock and/or sampler seal, to detect sample tampering. A user must inform the city prior to breaking a lock or sampler seal unless necessary to prevent loss of life, personal injury, or severe property damage. A user shall not place additional seals or locks upon a sampler which may be used by the city without first obtaining approval from the city.
  - i. Comment: Please advise if with the tamper lock on the sampler how the City will insure the sampler is clean and ready for initiation of next sample.
- 5. 13.08.570 User Charge
  - a. Interim Fees: Please advise and publish justification for 2023 rate study when available.
  - b. Section E2: Fees for analysis performed by third-party laboratories shall be the full cost of each analysis.
    - i. Comment: Please advise that reports and results for ALL test results should be forwarded to industrial-commercial user as soon as available.
- 6. 13.08.630 Extra Strength charges and slug load penalties.
  - a. Section 1: Determination of extra strength violations shall be measured using a grab or composite sample. Sampling may be by the city with or without the user's knowledge at the routine sampling location or any suitable location determined the city.
    - i. Comment – Slug is defined as 15 minutes of flow, define sampling must be minimum 15-minute composite or as further defined.

We are looking forward to working with the City of Oskaloosa on reviewing these specific circumstances and improving the sampling process.

In conclusion, OFPC again requests a work meeting within 30 days to discuss and outline the requested information to work towards a timely resolution. We request the formation of Cross-Functional Team, including but not limited to City Staff, City Engineering Support and City Leadership.

Sincerely,

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