



Issue

Storage of septage at a centralized location

Decision

This is a Program Management Decision which establishes continuity between two separate rules by allowing Minnesota Pollution Control Agency (MPCA) licensed Subsurface Septic Treatment System (SSTS) Maintenance businesses to store up to 50,000 gallons of septage in registered underground sewage tanks without a state disposal system permit (SDS permit) as long as a local SSTS permit is issued for the practice.

Background

Septage is the solids and liquids removed from SSTS sewage tanks or similar devices such as cesspools (Minn. R. ch. 7080.1100, subp. 69). All centralized storage or treatment of septage is defined as a "Treatment Works" in Minn. R. ch. 7041, which reclassifies septage as municipal biosolids. This reclassification as biosolids requires a state permit to be issued for the Treatment Works. In addition, all land application practices in chapter 7041 must be followed, which requires land application by a Type IV operator (MN rules chapter 7048).

Midsized SSTS (MSTS), which are permitted locally, can include up to 50,000 gallons of sewage tank capacity for the treatment and storage of sewage liquids and solids. Therefore, it is reasonable to conclude that storage of septage can be safely undertaken in the same manner as done for MSTS.

Maintainers sometimes have difficulty land spreading their daily haul of septage due to weather conditions. Consequently, the MPCA has received requests from Maintainers in recent years to store relatively small amounts of septage for short periods of time when fields are not accessible. The need and conditions for the storage of relatively small amounts of septage was not known or envisioned in 1997 when Minn. R. ch. 7041 was developed. Rather, the rule was developed:

- for larger septage storage facilities, based on their operational needs,
- to conform to federal permitting (40 CFR pts. 122, 123, 124, and 501), and
- to conform to land application technical rules (40 CFR pt. 503, subp. B).

Further, the MPCA wishes to limit permitting to larger (septage) treatment works only. This is consistent with the approach taken by the Environmental Protection Agency (EPA) when adopting their sewage sludge permit rules. The preamble to EPA's 1989 final rules indicates it was not EPA's intent to permit relatively small storage tanks for short-term storage but only larger septage treatment works and septage generated by entities like municipalities which could potentially have commercial or industrial waste contributions.