

MICROLIFE MANAGEMENT, INC

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How We Can Offer MIPP Assistance

MicroLife Management realizes that ALL local entities strive to maintain and protect their public sewerage systems.. Under the supervision of your staff, we intend to provide assistance in existing Municipal Industrial Pretreatment Programs (MIPP). Often, such shall be for the expansion of program operation and enforcement, with emphasis towards dischargers of fat, oil or grease (FOG).

We propose to review current program elements, now chiefly directed towards what EPA defines as significant industrial users (SIU). Assuming your program has the necessary administrative/permitting elements and legal authority, we shall conduct an industrial waste survey (IWS) of non-residential POTW dischargers; via your sanitary collection system, as well as those in contributing municipalities. The results of this IWS shall be tabulated in a report, which shall examine all ramifications of expanding your MIPP to regulate non-SIU, as needed to reduce sewer maintenance and reduce the likelihood of system interference or POTW pass-through. Our report shall also attempt to integrate aspects of multi-municipal plumbing/health code enforcement, as they relate to grease trap design, installation and maintenance. We anticipate that this latter aspect shall be demonstrated to have the greatest impact on past/present/future FOG discharges.

Attached to this report shall be our analysis of manpower/laboratory time and costs, projected to permit, as well as regulate certain, additional non-SIU. We shall propose additional assistance by *MicroLife Management* to accomplish such program expansion. Existing staff and resources shall be utilized to the extent that the you deems appropriate. Insofar as MIPP were envisioned by Congress (pursuant to EPA mandate) to be self-liquidating, any additional costs incurred by you and your contractors implementing such a program, shall be passed on to some/all system users, via permit fees. Executed properly (with sufficient public

notice and stakeholder meetings), the latter cost-sharing should NOT adversely impact your labor or finances. Many of our clients recover additional non-SIU costs through a “lower base” of permit fees; generally funding such enforcement actions as needed, via a blend of surcharges and civil penalties.

Over a decade of contracted MIPP administration (as well as many years consulting directly to the regulated community) has clearly demonstrated that most POTW’s do not sufficiently control FOG discharges, despite the fact that they have the authority and funding basis to do so! *MicroLife Management* would like to assist you in stepping up to the plate, to be proactive in MIPP administration.

Our fee for providing assistance to municipalities and authorities, is \$66 per hour, portal to portal from Kennett Square, Pennsylvania. We do NOT charge for our initial interview (limited to one managerial or board presentation), phone calls or public educational programs. In the event that your organization, as well as any contributing municipalities, wish to contract our field staff on a more long-term basis for inspection, sampling and/or enforcement activity, we cut our rate in half. Like most independent contractors, we provide our own equipment, vehicles clerical support, proof of insurance and interface with your staff, only as you direct. A list of project references (many networked through existing municipal partners) and our brochure has been provided for your examination. Feel free to contact any reference, who can explain how *MicroLife Management* assisted them.

Again, thank-you for this opportunity and for taking the time to carefully evaluate our proposal. Hopefully you now realize how easy it is to enhance your existing MIPP, without further stretching your existing staff or budget. During our next visit to Myerstown and contributing municipalities, we can more clearly define our scope of work. A plan of the above sewer system(s) and perhaps a tour by MIPP staff, would greatly facilitate our projection of hours needed for an IWS.

We look forward to discussing this proposal with you and/or your representatives, soon. Feel free to call us with any questions or comments.