

METRO WASTEWATER RECLAMATION DISTRICT

MEMORANDUM

TO: Mickey Conway, District Manager

DATE: July 28, 2008
Updated: June 12, 2019

FROM: Bob Thomas, Director of Environmental Services
Jennifer Robinett, Regulatory Compliance Officer
Ridge Dorsey, Industrial Pretreatment Program Administrator

SUBJ: Approval of Specific Categories of Outdoor Facilities with Incidental and Insignificant Amounts of Stormwater where it is Impractical to Eliminate such Stormwater and Clarification of Prohibition of Structures Specifically Designed to Capture Stormwater

District staff continue to implement *Rules and Regulations* as authorized by Metro District's Board of Directors. Waivers of the stormwater prohibition and associated Capital Recovery Charges for the category of facilities listed below continue to be managed by District staff with no apparent impact to the sanitary sewer. We recommend that this memorandum be updated to clarify the District's *Rules and Regulations* regarding historical practices that may contribute stormwater to the sanitary sewer system.

In all cases, the facilities described below are not designed for stormwater collection but because they are outdoors and uncovered—at least to some degree—they will receive insignificant amounts of incidental stormwater and it is impracticable and virtually impossible to eliminate the stormwater. Any facility designed to capture and manage stormwater, such as parking lot drains connected or not to sand/oil separators, subterranean drain systems, roof gutters and drains, etc. are prohibited by the District's *Rules and Regulations* from discharging to the sanitary sewer.

- **Outdoor water features (both for animals and humans) such as swimming pools, hot tubs/saunas, wading pools, open air pools, fountains, and bird baths.** Outdoor water features are artificially enclosed bodies of water typically intended for exercise, relaxation, therapy, aesthetics, and the general health and well-being of humans and animals. A number of the District's Connectors require outdoor water features to be plumbed to drain to the sanitary sewer system because of contaminants in the process waters, such as chlorine and organic material.
- **Loading Dock Areas.** A loading dock is an architectural fixture where trucks may be loaded and unloaded; they are commonly found on commercial and industrial buildings. The loading dock areas can be sheltered to some degree from rain and/or snow by a small overhang. Sanitary sewer taps have been issued, and sometimes required, by local municipalities for a number of open loading dock areas because of the contaminants present during the loading and unloading activities.

- **Uncovered Truck/Car Washes.** A truck/car wash is a facility used to clean the exterior of motor vehicles and various pieces of equipment. In certain cases, these facilities are not covered because they are designed for odd-shaped vehicles/equipment. Many truck/car wash facilities are now required by law to treat and reuse their water. Sanitary sewer taps have been issued by local municipalities for a number of car/truck wash facilities with no roofs over the drains because of the contaminants washed off of the vehicles/equipment (oil/grease, dirt, etc.).
- **Outdoor trash transfer stations.** A trash transfer station is defined as a solid waste processing site where solid waste is transferred from one vehicle to a storage device for temporary storage until transferred to a permanent disposal site. The transfer station can be sheltered to some degree from rain and/or snow by a small overhang. Sanitary sewer taps have been issued, and sometimes required, by local municipalities for a number of outdoor trash transfer stations because of the contaminants associated with the trash being transferred.
- **Outdoor solidification areas.** A solidification area is defined as a solid waste processing site where solid waste is transferred from one vehicle to a solidification area for temporary storage and dewatering until dry enough to be transferred to a permanent disposal site. The solidification area can be sheltered to some degree from rain and/or snow by a small overhang. Sanitary sewer taps have been issued for a number of outdoor solidification areas because of the contaminants in the solid waste being dewatered.

Recommended by:

Approved by:


Director of Environmental Services


District Manager


Regulatory Compliance Officer


IPP Administrator