

BILL PURCELL
MAYOR



METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY

November 29, 2000

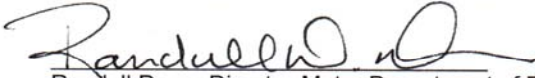

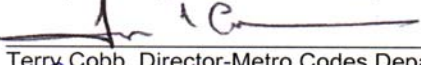
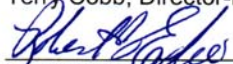
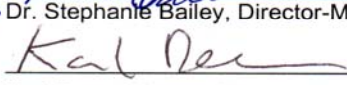
DEPARTMENT OF PUBLIC WORKS
NPDES PROGRAM
POINT PLACE BUSINESS PARK
441 DONELSON PIKE, SUITE 350
NASHVILLE, TENNESSEE 37214-3558
OFFICE: (615) 880-2420
FAX: (615) 880-2425

To whom it may concern:

This communication and the attached "Metropolitan Government of Nashville and Davidson County - Cooperative Discharge Directive" is intended to discuss Metro's current efforts to eliminate a category of illicit/wastewater discharges that are routinely found to be occurring at sites across the county. These discharges normally route directly or indirectly into the municipal separate storm sewer system (MS4), which represents a violation of various Federal, State, and Metro statutes (not to mention the negative water quality impacts to Davidson County streams and rivers). These illicit discharges often result from, but are not limited to, outside cleaning/maintenance activities at sites that process and/or serve food. Specific examples of these discharges would include such wastewater flows as leachate from food-containing dumpsters, contaminated wash water resulting from outside cleaning activities, and dumped "mop water" from interior cleaning activities.

There are fairly simple solutions to eliminate these illicit discharges, however, the solutions are often impacted by guidelines and regulations from several Metro agencies. It is the intent of this directive to bring these various regulations to a single point of reference in order to assist the public in creating an effective solution to comply with all Metro agencies involved. This communication is the result of Interdepartmental meetings aimed at summarizing complete and consistent enforcement and compliance information on this subject for both Metro and the public. Additionally, this correspondence is intended to serve as a regulatory compliance guide to entities falling under these statutes so they may better understand both why this situation cannot be allowed and which type of activities constitute a violation. These guidance materials are for the benefit of both existing and future facilities. If you have any questions pertaining to this correspondence, please refer to the attached "directive" for specific contact information.

Please find below the signatures of the Metro Department Directors involved with this issue.

 Randall Dunn, Director-Metro Department of Public Works	<u>12-5-00</u> Date
 Buddy Williams, Director-Metro Department of Water Services	<u>12/7/00</u> Date
 Terry Cobb, Director-Metro Codes Department	<u>12/6/00</u> Date
 Dr. Stephanie Bailey, Director-Metro Health Department	<u>12/6/2000</u> Date
 Karl Dean, Director-Metro Department of Law	<u>12/6/00</u> Date

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Metropolitan Government of Nashville and Davidson County - Cooperative Discharge Directive

- I. Metro Departments of Public Works and Metro Water and Sewerage Services initiate this directive in a cooperative effort to:
 - a. Reduce contamination routing to Metro's storm water drainage system (MS4).
 - b. Stop uncontaminated storm water from being routed to the Publicly Owned Treatment Works (POTW).
 - c. Inform and educate all concerned of existing codes and regulations.
- II. Applicable Regulations
 - a. Metro Water Services

Metro Code of Laws Title 15.60.100/110
Prohibits the discharge of uncontaminated storm water to the POTW.
 - b. Public Works

Metro Code of Laws Title 15.64.205
Prohibits illicit discharges to Metro's MS4 and identifies allowable discharges; "...all non-storm water discharges into the municipal separate storm sewer system of the metropolitan government are prohibited and are declared to be unlawful."
 - c. Health Department

Tennessee Code Annotated Chapter 1200-23-1-02
Defines water used in any cleaning operation is to be disposed of as sewage.
 - d. Metro Codes Department

Standard Plumbing Code Chapter 11 (1994 Edition)
Provisions governing Storm Drainage
- III. Why is this important?
 - a. Metro Water Services has spent over \$800 million to stop overflows and bypasses caused by the added volume of storm water being routed to the POTW.
 - b. Public Works' NPDES program is tasked with preventing contaminated discharges from entering "Waters of the State" through Metro's MS4 to comply with the Federal Clean Waters Act and the State's Water Quality Control Act.
 - c. Metro Health Department's concern is with the public's health. Dumpster and grease recycling areas need to be kept clean and free of food sources so as not to attract disease-carrying vectors.
- IV. How is this achieved?
 - a. To prevent contaminated water from entering the storm water drainage system, areas which have the potential for contamination or require periodic wash downs, should be in an area that routes to the POTW. These areas must follow the guidelines set forth by Metro Water Services.
 - b. Depending on the situation, one or more of the following measures should be taken to prevent uncontaminated storm water from entering an outside area where contaminated water is to be routed to the POTW:
 - i. Restrict contaminated area by one of the following methods:
 1. Bermed -- An area that has an elevated ridge that effectively routes any storm water runoff away from drain routing to the POTW.
 2. Diked -- An area that has an enclosed containment wall sufficient to contain any contaminated water collected, which is then routed to the POTW.
 3. Elevated -- A platform or area that is built up higher than storm water flow and sloped to a center drain routing to the POTW.
 - ii. Contaminated area will be covered
All containment vessels, which are located outside and exposed to storm water, need to be covered to prevent storm water from entering the clean-up area.

- iii. Routed through grease trap
Facilities with grease traps will be required to have all outside drains in the contaminated area route to the grease trap before entering the POTW.
- iv. Alternative treatment/discharge
Alternative treatment/discharge methods may be used if approved by both Metro Water Services and Public Works' NPDES program.
- V. Administration and Enforcement – Failure to comply will result in enforcement action (Metro Code of Laws 15.60.460 and 15.64.205).
- VI. Attachment
 - a. Web sites
 - i. www.ordlink.com/codes/nashvill/_DATA/TITLE15/index.html
 - ii. www.ordlink.com/codes/nashvill/_DATA/TITLE15/Chapter_15_60_INDUSTRIAL_WASTE_DIS/15_60_100_Unpolluted_stormwate.html and www.ordlink.com/codes/nashvill/_DATA/TITLE15/Chapter_15_60_INDUSTRIAL_WASTE_DIS/15_60_110_Unpolluted_water_pro.html
 - iii. www.ordlink.com/codes/nashvill/_DATA/TITLE15/Chapter_15_64_STORMWATER_MANAGEMEN/15_64_205_Non_stormwater_disch.html
- VII. Distribution List
 - a. Public Works Storm Water Management-Plans Review – given out at the time of grading permit application submittal.
 - b. Metro Water Services Permit Section – given out upon application of commercial water/sewer permit.
 - c. Metro Public Health Department – handed out during Food Services Health Inspection.
 - d. Metro Codes Department – given out upon application of commercial plumbing permit.
 - e. Metro Water Services Engineering Section – given out upon plans review.



Metro Water Services complies with the Americans with Disabilities Act. For additional information contact Joseph A. Estes, Sr., 1600 2nd Avenue North, Nashville, TN 37208-2206; telephone 615-862-4862.