



MAINTENANCE - PRETREATMENT DEVICES

ENVIRONMENTAL GUIDELINE



Purpose	3
Activity Description	3
Expectations	3
Best practices:	3
Shall Not	4
References	4
Contacts	4
Additional Resources	4



PURPOSE

The purpose of this guideline is to provide guidance on what DEN's expectations are for the Maintenance of Pretreatment devices located on DEN property. The purpose of this EG is to explain the different devices we have at DEN, how to properly document required maintenance activities. The proper maintenance of these features is a compliance obligation for the City and County of Denver's MS4 Permit.

ACTIVITY DESCRIPTION

Maintenance of pretreatment devices - including all devices used to alter the characteristics of water prior to discharge to either the sanitary or storm sewer systems. These devices include oil water separators, sand traps, grease traps, grit chambers, and sand filters. DEN tenants are responsible for providing maintenance and documenting maintenance activities for devices treating water connected with their operations. DEN is responsible for providing maintenance and documentation for City owned devices treating common use areas (e.g., main terminal and parking structures, concourses) and non-common use areas (e.g., Maintenance Center).

EXPECTATIONS

Best practices:

- A business partner representative should be present when any pumping is being performed so that proper cleanout procedures by the contractor are ensured and the device is not damaged. Pumping companies are not allowed to decant water back into the device after removing the solids without approval from DEN Environmental Services (ES). These fluids must be disposed of appropriately with the collected wastes and disposed off-site at an appropriately permitted facility.
- Visually inspect pretreatment devices routinely and do not allow the equipment to overflow. Devices should be kept on a regular cleaning schedule (depending on usage) or when the device meets the following criteria:
 - Pump out the grease/oil cap when it reaches 12" cap and/or 9" of solids on the bottom of the trap.
 - Pump out the sand trap when 9" + of solids accumulate on the bottom of the trap or 4" or more of oil is observed in the trap.
- Visually inspect pretreatment devices after cleanout for any damage to the system. If any damage is noted, notify the DEN Director of Environmental Programs immediately.
- Schedule cleanout of pretreatment devices using contractors approved by the City and County of Denver (CCD) Department of Transportation and Infrastructure (DOTI) to comply with the agreed-on device maintenance schedule. *Obtaining Department of Public Works Wastewater Management Approval of*



Pretreatment Device Maintenance Contractors provides guidance for obtaining WMD approval for vendors/service companies.

- Protect storm drain inlets and drains, within proximity, with curb socks, rock berms, inlet protection, or drain covers/mats prior to any activity.
- Leaking material containers should be properly discarded and replaced.
- Monitor equipment for leaks and use drip pans, as necessary.
- If necessary, sweep or vacuum the area once activities are complete.
- If a spill occurs, call DEN Communications Center immediately at 303-342-4200
- Training will be conducted to inform employees of impacts associated with illegal discharges and improper disposal of waste from municipal operations. Records of this training should be maintained and available upon request.
- If maintenance activities are performed under DEN's Industrial Stormwater Management Plan, evidence of stormwater training is expected.
- If the facility is not on a regular cleaning schedule, the Tenant Pretreatment Device Measurement Record (or other similar record of inspection) should be completed at least once a month to demonstrate that the device does not need cleaning.
- For tenant and operator facilities, invoices should be maintained on file at the tenant / operator site and available for review by DEN.
- Records for devices maintained by DEN are maintained by DEN Plumbing Department.
- Annual yellow grease collection totals shall be submitted to DEN ES for inclusion into the DEN Environmental Annual Report.

Shall Not

- Sand/oil/grease and other waste material removed from the trap/interceptor should not be introduced into any drain, sewer, storm drain or natural body of water.
- Do not decant water back into the trap/interceptor after removing the waste material.
- Do not use hot water, acids, caustics, solvents, or emulsifying agents when cleaning grease traps and interceptors.
- Do not utilize biological agents for grease remediation.

REFERENCES

Contacts

- DEN Environmental Services (Main Line): 303-342-2730; DENEnvironmental@flydenver.com

Additional Resources

- DEN Stormwater Management Plan (SWMP)
- DOT Labeling and Placarding Guidance
- SPCC Plan



- 40 CFR 117.3 Determination of Reportable Quantities for a Hazardous Substance
- 40 CFR 122-124 NPDES Regulations for Storm Water Discharges
- 40 CFR 260-262-273 Federal RCRA Regulations
- 40 CFR 150-189 Federal Insecticide, Fungicide and Rodenticide Act Regulations
- 6 CCR 1007-3, Part 261 State RCRA Regulations
- City and County of Denver Municipal Separate Storm Sewer System (MS4) Permit
- City and County of Denver Pesticide Discharge Management Plan
- CCoD Ordinances
- Denver Wastewater Management Division Rules and Regulations
- Metro Wastewater Reclamation District Rules and Regulations
- DEN Rules and Regulation 180
- City and County of Denver Mayor's Executive Orders
- DEN Managers Bulletins
- CCoD Executive Orders