



STATE OF IOWA

CHESTER J. CULVER, GOVERNOR
PATTY JUDGE, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
RICHARD A. LEOPOLD, DIRECTOR

July 16, 2009

Roy Martin
City of Boone
923 8th Street, P.O. Box 550
Boone, IA 50036

RE: Madden Inc. - Truck Wash Facility
2200 block of East 4th Avenue, Boone, IA
Complaint No. 3747 (Boone NPDES Permit #: 0819001)

Dear Mr. Martin:

I requested that the City of Boone investigate the wastewater disposal system at the Madden trucking truck washing facility on the east side of Boone. You reported to me that the wash bays drain to a sand filter, which discharges through a tile line to an open waterway near Snedden Drive. You indicated that a Boone city ordinance allows vehicle washing facilities to be constructed in this manner. However, no testing of the effluent is being conducted.

Below is a portion of the regulations governing installation and operation of an on-site wastewater treatment system:

69.1(3) General regulations.

a. Connections to approved sewer system.

(1) No onsite wastewater treatment and disposal system shall be installed, repaired, or rehabilitated where a public sanitary sewer is available or where a local ordinance requires connection to a public system. The public sewer may be considered as not available when such public sewer, or any building or any exterior drainage facility connected thereto, is located more than 200 feet from any proposed building or exterior drainage facility on any lot or premises which abuts and is served by such public sewer. Final determination of availability shall be made by the administrative authority.

(2) When a public sanitary sewer becomes available within 200 feet, any building then served by an onsite wastewater treatment and disposal system shall connect to said public sanitary sewer within a time frame or under conditions set by the administrative authority.

(3) When a public sanitary sewer is not available, every building wherein persons reside, congregate or are employed shall be provided with an approved onsite wastewater treatment and disposal system.

(4) If a building is to be connected to an existing onsite wastewater treatment and disposal system, that existing system shall meet the standards of these rules and be appropriately sized.

b. Discharge restrictions. It is prohibited to discharge any wastewater from onsite wastewater treatment and disposal systems (except under an NPDES permit) to any ditch, stream, pond, lake, natural or artificial waterway, county drain tile, surface water drain tile, land drain tile or to the surface of the ground. Under no conditions shall effluent from onsite wastewater treatment and disposal systems be discharged to any abandoned well, agricultural drainage well or sinkhole. Existing discharges to Ch 69, p.4 IAC any of the above-listed locations or structures shall be eliminated by constructing a system which is in compliance with the requirements of these rules.

c. Construction or alteration. All onsite wastewater treatment and disposal systems constructed or altered after the effective date of these rules (May 13, 1998) shall comply with these requirements. Alteration includes any changes that effect the treatment or disposal of the waste. Repair of existing components that does not change the treatment or disposal would be exempt. However, the discharge restrictions in "b" above would always apply.

This indicates that if the existing Madden on-site system is to continue discharging to a tile or waterway, a discharge permit must be obtained from the DNR. Effluent water quality from a truck wash can vary widely, so some preliminary testing would likely be required to characterize the waste. When this is completed, limits on the concentrations of various water quality parameters (e.g., petroleum and its constituents, COD, pH, suspended solids, etc.) would be set in a permit. Regular testing of effluent quality would then be needed to show compliance.

As indicated above, state regulations now require connection of a new or updated vehicle wash facility to a public sanitary sewer, where available. I strongly recommend the city of Boone change its ordinance and require all new and existing facilities to connect to the municipal sanitary sewer.

Therefore, by August 31, 2009, please submit a response addressing this issue. The response could be in the form of an NPDES permit application for Madden, or a time schedule for connecting Madden to the municipal sanitary sewer. You may contact me (515-725-0271; bill.gross@dnr.iowa.gov) with any questions or comments.

Sincerely,

Bill Gross
Environmental Specialist Senior, Field Office #5

c: Angela Chen, DNR Wastewater Section
Al Irey, Madden, Inc., 2110 East 4th Street, Boone, IA 50036