

# FIRE SPRINKLER DISCHARGE

San Diego Regional Storm Water Management  
Committee Meeting

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## RWQCB TENTATIVE ORDER NO. R9-2006-0011 NPDES NO. CAS0108758

### Section B.3

Emergency fire fighting flows (i.e., flows necessary for the protection of life or property) do not require BMPs and need not be prohibited. As part of the Jurisdictional Urban Runoff Management Plan (JURMP), each Copermittee shall develop and implement a program to reduce pollutants from non-emergency fire fighting flows (i.e., flows from controlled or practice blazes and maintenance activities) identified by the Copermittee to be significant sources of pollutants to waters of the United States.

## Inconsistency Among Copermittee (Based on Phone Interview by City of Carlsbad)

1. City of Carlsbad\*
2. City of Chula Vista\*
3. City of Coronado\*
4. City of Del Mar
5. City of El Cajon\*
6. City of Encinitas
7. City of Escondido
8. City of Imperial Beach
9. City of La Mesa
10. City of Lemon Grove
11. City of National City
12. City of Oceanside\*
13. City of Poway\*
14. City of San Diego\*
15. City of San Marcos
16. City of Santee
17. City of Solana Beach
18. City of Vista
19. County of San Diego (not surveyed)
20. San Diego Unified Port District
21. San Diego County Regional Airport Authority (not surveyed)

No written policy

\*Discharge to Storm Drain Prohibited

## Uniform Plumbing Code Requirements

Section 812.0 Clear Water Wastes...

*includes sprinkler systems*

Section 805.0 Pressure Drainage Connections...

*cannot be directly connected to sanitary drainage system*

Section 801.4 Connections from Water Distribution System...

*requires an airgap above flood level rim of receptor (e.g., above manhole or drain inlet rim)*

# National Fire Protection Association (NFPA13) Standard Requirements

Section 8.15.2.1 Drainage, General...

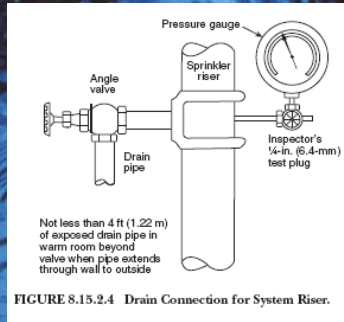
*all sprinkler pipe and fittings must be installed to drain*

Section 8.15.2.4.4 System, Main Drain, or

Section Drain Connections... *drains shall discharge outside or to a drain connection*

Section 8.15.2.6.1 Discharge of Drain

Valves... *direct interconnections shall not be made between the sprinkler drains and sewers*



## Example Systems



## Summary

- ◆ RWQCB does not prohibit fire sprinkler discharge
- ◆ Lack of consistency among copermittees
- ◆ Each discharge not proven to be “significant source of pollutants to waters of the U.S.”
- ◆ Most sprinklers discharge to storm drain...including city's
- ◆ Uniform Plumbing Code and NFPA Standards prohibit direct connection to sanitary sewer
- ◆ Capacity of sanitary sewer may prove inadequate
- ◆ Plumbing re-routes may be cost prohibitive and difficult
- ◆ BMPs exist to minimize flow/reduce potential pollutants

## Recommendations

- ◆ Maintain proposed language in RWQCB tentative order
- ◆ Allow discharge to storm drain when BMPs are implemented
- ◆ Develop consistent policies among cities
- ◆ Facilitate permitting strategy/agreements with metro wastewater agencies for discharges to sanitary sewer
- ◆ Grandfather existing facilities...**don't forget the cost to re-route hundreds of your own facilities!!**
- ◆ Consider routing to sanitary sewer for new facilities subject to SUSMP requirements
- ◆ Update local plumbing code when discharge is required to sanitary sewer
- ◆ Train Building Inspectors/Plan Checkers on discharge requirements

***Note...some facilities have delayed testing their systems because of local prohibitions, thereby compromising fire safety!!***