

*City of Alexandria, Virginia*


---

**MEMORANDUM**

MEMORANDUM TO INDUSTRY NO. 27-02

ISSUED DATE: JUNE 26, 2026

TO: DEVELOPERS, ARCHITECTS, ENGINEERS, AND SURVEYORS

FROM:  ERIN BEVIS-CARVER, P.E., SANITARY INFRASTRUCTURE DIVISION CHIEF, TRANSPORTATION AND ENVIRONMENTAL SERVICES

SUBJECT: UPDATED DEVELOPMENT REQUIREMENTS FOR THE COMBINED SEWER SERVICE AREA

---

**SUMMARY OF UPDATES**

This Memo to Industry (Memo) is being updated (effective date on the issued date of this memo) to specify developer requirements related to conversions projects. Requirements related to all other development/redevelopment projects listed in this Memo are identical to those requirements in the previous Memo to Industry 23-02.

**BACKGROUND**

The City of Alexandria (City) owns and operates a combined sewer system (CSS) serving an area of about 540 acres, which is primarily located east of the railroad corridor and centered in Old Town, Alexandria (Figure 1). The City's CSS of is divided into three separate CSS areas: King and West, Royal, and Pendleton as shown on the figure. There are three components of flow in the CSS, municipal wastewater (sanitary sewage), groundwater, and stormwater runoff. During dry weather, sanitary sewage collected and intermittent sump pump discharge of groundwater from homes and businesses in the CSS are conveyed to the AlexRenew wastewater treatment facility. During wet weather periods stormwater runoff is further introduced to the pipe network, and the capacity of

the CSS may be exceeded. The excess flow, which is a combination of stormwater runoff, groundwater, and sanitary sewage, is discharged to the Waterfront Tunnel or Hooffs Run Interceptor, constructed by AlexRenew as part of its RiverRenew Program. In periods of significant wet weather, combined sewer flow may be discharged into Hooffs Run, Hunting Creek, or the Potomac River through AlexRenew's four permitted combined sewer outfalls. These outfalls are regulated under the AlexRenew Virginia Pollutant Discharge Elimination System (VPDES) Permit, The City has an agreement with AlexRenew through its Sewer Service Agreement to operate the CSS in compliance with the requirements of the VPDES Permit.

## **PURPOSE**

The purpose of this Memorandum to Industry is to present the City's CSS Management Policy related to development and redevelopment in the combined sewer area. This policy has been developed to minimize the environmental impacts of CSOs on the receiving waters and to comply with the AlexRenew VPDES permit. This memo provides a path for developers to follow for projects located in the CSS area. The requirements related to development/redevelopment projects in the CSS are presented below.

## **EXCEPTIONS**

The following exceptions only apply to the CSS Management Policy stated in this Memorandum to Industry. All other requirements related to development/redevelopment shall be adhered to.

1. Single family residence not part of a larger redevelopment project.
2. Addition to an existing property that does not increase the amount of wastewater and construction or grading operations or both that do not disturb more than 2,500 square feet of land area.

## **CSS MANAGEMENT POLICY REQUIREMENTS**

The goal of the Combined Sewer System Management Policy is to minimize the impact of combined sewer discharges to the environment. All new development and/or redevelopment projects (not listed in Exceptions) shall be required to implement the Combined Sewer System Management Policy.

### Requirements for Development/Redevelopment Projects (Excluding Conversion Projects)

All applicants will be required to provide onsite separation and implement Option A when connection to a fully separate sewer system is available. The requirements are as follows for both wastewater and non-wastewater flows for all development projects (excluding conversion projects):

#### ***Wastewater Flows***

- Option A (preferred option): All sanitary sewage from the redevelopment site shall discharge to a fully separated sanitary sewer system (i.e., does not discharge to a combined sewer downstream) if such a system is available as determined by the Director of T&ES. If the developer is able to separate additional offsite areas (either upstream or downstream from the project site), then a credit will be applied to the sewer connection fees per Section 5-6-25.1 of City Code of Ordinances. If this difference is greater than the sewer connection fee, then the sewer connection fee will be waived, and no addition credit or payment will be provided by the City.
- Option B (if Option A is not achievable):
  - Provide for offsite separation of sanitary sewers to the satisfaction of the Director of T&ES. The number of units (or non-residential equivalent) separated must be at least the same as the proposed development. City Staff will work with the developer (or developer's representative) to determine which option is most practicable, or;
  - Pay a contribution in lieu of offsite separation:  
Sanitary Fee = \$1.50 x proposed peak wastewater flow in gallons\*\*

*\*\*Proposed Peak wastewater flow from new development/ redevelopment projects, calculated using flow factors from the Sanitary Sewer Adequate Outfall Memo to Industry No. 06-14*

***Non-Wastewater Flow – Stormwater Runoff***

- Option A (preferred option): All stormwater from the redevelopment site shall discharge to a fully separated storm sewer system (i.e., does not discharge to a combined sewer downstream) if such a system is available as determined by the Director of T&ES.
- Option B (if Option A is not achievable): Reduce the amount of the stormwater runoff into the CSS by 10 percent for the 10-year 24-hour design storm (i.e., post-development peak runoff equal to or less than 90 percent of the peak runoff for the pre-development condition).

***Non-Wastewater Flow – Groundwater***

If it is not feasible to make buildings watertight to require no sump pump discharges, then the following requirements will be met for such development projects.

- Option A (preferred option): For projects that require sump pump discharge of groundwater flow, the flow shall be connected to a fully separated storm sewer system if such a system is available as determined by the Director of T&ES.
- Option B (if Option A is not achievable): Provide additional stormwater detention to accommodate the peak flow of groundwater discharge (i.e., post-development peak combined non-wastewater flow equal to or less than the peak stormwater runoff for the pre-development condition).

Note that there shall be no sump pump discharges of groundwater into stormwater BMPs (Best Management Practices), and the sump pump discharge of contaminated groundwater shall be pretreated to eliminate pollutants or reduce the amount of pollutants to a less harmful state prior to being discharged into the city's sewer system.

## Requirements for Conversion Projects

The requirements are as follows for both wastewater and non-wastewater flows for conversion projects:

### ***Wastewater Flows***

- Pay a sanitary contribution fee as follows below. If there is no net increase in flow, then the conversion project shall not be required to pay a sanitary contribution fee.

Fee = \$1.50 x net peak wastewater flow in gallons\*\* (proposed – existing)

*\*\*Peak wastewater flow calculated using flow factors from the Sanitary Sewer Adequate Outfall Memo to Industry No. 06-14*

### ***Stormwater Runoff***

- If the area of land disturbance is greater than 2,500 sqft, reduce the amount of the stormwater runoff into the CSS by 10 percent for the 10-year 24-hour design storm (i.e., post-development peak runoff equal to or less than 90 percent of the peak runoff for the pre-development condition).
  - If the area of land disturbance is less than 2,500 sqft, then there shall be no separate stormwater runoff requirement.

## **FOR ADDITIONAL INFORMATION**

If you have any questions about the CSS Management Policy, please contact Erin Bevis-Carver, Sanitary Infrastructure Division Chief, T&ES at 571.213.5733.

Attachments: Figure 1. Map of Combined Sewer System

