



Land Use Application

Project Information		
Project Title: Honey Bucket Rental Facility - Code Interpretation		
Brief Description: Honey Bucket is seeking a code interpretation of TDC 39.450, TDC 39.420, and several supporting provisions pursuant to TDC 31.070.		
Estimated Construction Value: N/A - no development occurring		
Property Information		
Address: 18805 SW 108th Ave., Tualatin, OR 97062		
Assessor's Map/Tax Lot Number: Tax Lots: 2S122AD00600, 2S122AD00700, 2S122AD00800		
Applicant/Primary Contact		
Name: Merissa Moeller	Company Name: Stoel Rives	
Address: 760 SW Ninth Ave, Suite 3000		
City: Portland	State: Oregon	ZIP: 97205
Phone: 503-294-9455	Email: merissa.moeller@stoel.com	
As the person responsible for this application, I hereby acknowledge that I have read this application and state that the information in and included with this application in its entirety is correct. I agree to comply with all applicable City and County ordinances and State laws regarding building construction and land use.		
Applicant's Signature: <i>Merissa A. Moeller</i>		Date: June 6, 2025
Property Owner		
Name: <i>Willy Lump Lump LLC.</i>		
Address: <i>4500 SW Advance Rd</i>		
City: <i>Wilsonville</i>	State: <i>OR</i>	ZIP: <i>97070</i>
Phone: <i>503-572-2568</i>	Email: <i>aneelye@nwmp.com</i>	
Letter of authorization is required if not signed by owner.		
Property Owner's Signature: <i>William Scott Morgan</i>		Date: <i>June 6th 2025</i>

LAND USE APPLICATION TYPE:

- | | | |
|--|---|---|
| <input type="checkbox"/> Annexation (ANN) | <input type="checkbox"/> Conditional Use (CUP) | <input type="checkbox"/> Minor Architectural Review (MAR) |
| <input type="checkbox"/> Architectural Review (AR) | <input type="checkbox"/> Historic Landmark (HIST) | <input type="checkbox"/> Minor Variance (MVAR) |
| <input type="checkbox"/> Architectural Review—Single Family (ARSF) | <input type="checkbox"/> Industrial Master Plan (IMP) | <input type="checkbox"/> Sign Variance (SVAR) |
| <input type="checkbox"/> Architectural Review—ADU (ARADU) | <input type="checkbox"/> Plan Map Amendment (PMA) | <input type="checkbox"/> Variance (VAR) |
| | <input type="checkbox"/> Plan Text Amendment (PTA) | X Other: <u>Code Interpretation</u> |
| | <input type="checkbox"/> Tree Removal Permit (TCP) | |

Office Use		
Case No:	Date Received:	Received by:
Fee:	Receipt No:	



June 5, 2025

Merissa Moeller
760 SW Ninth Avenue, Suite 3000
Portland, OR 97205
D. 503.294.9455
merissa.moeller@stoel.com

VIA EMAIL (slombos@tualatin.gov)

Sherilyn Lombos, City Manager
City of Tualatin
18880 SW Martinazzi Ave.
Tualatin, OR 97062

RE: Formal Code Interpretation Request – 18805 SW 108th Ave., Tualatin, Oregon

Dear Ms. Lombos:

This office represents Northwest Cascade, Inc. DBA Honey Bucket (“Honey Bucket”) with respect to certain land use activities at 18805 SW 108th Ave., Tualatin, Oregon (“Site”). This letter provides facts and analysis in support of Honey Bucket’s request for a formal code interpretation pursuant to Tualatin Development Code (“TDC” or “Zoning Code”) 31.070, filed concurrently with this letter.

As further detailed below, Honey Bucket is requesting a formal code interpretation that Honey Bucket’s industrial equipment storage and rental business is a Wholesale Sales primary use allowed as of right at the Site under TDC 39.450. This conclusion is supported by the Zoning Code’s text and relevant context. It also advances the City of Tualatin’s (“City”) policy goals by allowing a portable restroom and industrial equipment rental business to continue operating within Tualatin city limits to support the City’s economic and real estate growth.

I. Background

Honey Bucket operates a business at the Site storing portable restrooms and other job site equipment that is ultimately rented to industrial and construction customers as a business-to-business operation. Honey Bucket’s offerings include portable restrooms, ranging from standard units to high-end luxury models; shower units; temporary fence panels (fencing); temporary metal storage containers; and ground-level office units. Honey Bucket does not sell or rent its equipment to the public onsite. While communications with City staff to date have focused on the portable restroom units and an associated temporary waste holding tank, these activities reflect only a portion of the Site’s operations. The Site also stores a much broader array of other industrial equipment necessary to support staging areas, construction sites, temporary events, and other commercial and industrial operations vital to sustain the City’s growth.

The Site is located in the City’s Light Manufacturing Zone (“ML zone”). City staff recently notified Honey Bucket that its “business was operating on a property that was not zoned for [Honey Bucket’s current] use,” based on staff’s initial conclusion that the business is a Solid

Waste Treatment and Recycling use pursuant to TDC 39.420 and thus a prohibited use in the ML zone. We believe that categorization is incorrect for the reasons discussed below, and we have communicated with City staff over the past several months seeking to resolve this zoning categorization issue.

We appreciate City staff's patience and time working through this issue but ultimately disagree with staff's interpretation. We believe a formal code interpretation of the relevant use provisions will provide valuable clarity to Honey Bucket, similar businesses, and the City moving forward. In this letter, we provide additional details regarding Honey Bucket's business model and Site use in response to TDC 31.070's specific requests for information. We then demonstrate why Honey Bucket's primary use at the site is more accurately characterized as a Wholesale Sales use pursuant to TDC 39.450 rather than a Solid Waste Treatment and Recycling use pursuant to TDC 39.420, and the policy reasons supporting that legal interpretation.

II. Overview of Code Interpretation Process

TDC 31.070 establishes the process for the City Manager to make a formal interpretation of the Zoning Code. In situations such as this one, where a particular land use is not "specifically addressed" by the TDC, the City Manager has additional authority to classify a use into a "use category" (e.g., "Wholesale Sales") identified in TDC Chapter 39 through the formal code interpretation process. TDC 39.110. Beyond the use categories, uses are also classified as primary, limited, or accessory uses. Of particular note, accessory uses are "allowed in all zones in conjunction with the primary use." TDC 39.100.

"The City Manager has the initial authority and responsibility to interpret all terms, provisions and requirements of the Tualatin Development Code." TDC 31.070(1). When doing so, the City Manager must follow "the rules of statutory construction under ORS Chapter 174, as interpreted by Oregon courts." TDC 31.105(3).¹ Under those rules, the City Manager must jointly consider the applicable provision's explicit text and relevant context.² The City Manager retains some discretion to interpret ambiguous provisions of the code to further the City's policy goals, to the extent that the City Manager's interpretation is not inconsistent with the express wording of the TDC, as read in its applicable context. We also understand that the City Manager's decision can be appealed to the Tualatin City Council ("City Council") for a final, official code interpretation that is binding on the City.³

¹ See also, e.g., *Mental Health Div. v. Lake Cnty.*, 17 Or LUBA 1165, 1172 (1989) ("The rules that govern statutory construction also apply to the construction of local government ordinances.").

² The City Manager may also give weight to the provision's legislative history, even absent any ambiguity in the language, if such "legislative history appears useful to the [City's] analysis." See *State v. Gaines*, 346 Or 160, 172 (2009). To date, we have not identified legislative history relevant to interpret the applicable code provisions.

³ The City Council's final interpretation is entitled to deference so long as the Council's interpretation is plausible. See *Siporen v. City of Medford*, 349 Or 247, 261 (2010) (holding that when reviewing a local jurisdiction's interpretation of its own code, the reviewing court is limited to "determin[ing] whether the local government's interpretation in fact is 'plausible.'"). The City Council's decision is plausible so long as it is not

III. Information Required by TDC 31.070

TDC 31.070(2) identifies specific factual information that must be included in a code interpretation request to assist the City Manager in her review. We also include information about the primary and accessory components of Honey Bucket's use based on the same factors under TDC 39.100, which is relevant to classifying the use appropriately. Responses to those specific items are as follows:

A. The amount and type of traffic generated – TDC 31.070(2)(a).

Honey Bucket's business typically operates five days a week, between 4:00 AM and 7:00 PM. In response to demand surges or during peak event seasons, the business may operate seven days a week with extended hours. During operating hours, pick-up and delivery trucks leave the Site in the morning with clean, restocked portable restrooms and other equipment for delivery and return to the Site with empty, used equipment at the end of the day, or, during demand surges, several times a day. Honey Bucket's delivery vehicles are single-axle, non-commercial driver's license ("CDL") trucks and trailers. The longest truck and trailer combination is sixty-five (65) feet. The service vehicles are single-axle, non-CDL trucks with fresh water and wastewater tanks mounted on the back and are approximately the size of a UPS residential delivery truck.

As further discussed below, the Site currently contains a temporary waste holding tank. Waste from portable restroom units rented to customers is pumped into trucks offsite, transported to the Site, and temporarily stored in this waste holding tank, before being emptied by another truck and delivered to a permanent disposal site.⁴ Only one truck is engaged in the removal of waste from the temporary waste holding tank onsite. That truck empties the tank either once or twice a day, depending on capacity, to deliver that waste to a permanent disposal site.

All trucks return to the Site at the end of the day between 3:30-7:00 PM depending on that day's service needs.

B. The type of manufacturing or commercial process – TDC 31.070(2)(b).

The primary onsite business operation is industrial equipment storage. At the Site, employees stock and load clean restrooms, fencing, and other rented equipment onto pickup and delivery trucks, and process, clean, and store the portable restrooms and other equipment when they are returned to the Site. After use by commercial and industrial customers, all portable restroom

expressly *inconsistent* with the text of the code provision or with related policies that 'provide the basis for' or that are 'implemented' by the code provision." *Kaplowitz v. Lane Cnty.*, 285 Or App 764, 775 (2017). Thus, the City may interpret its code to advance pro-business and pro-growth policy goals, so long as the City's interpretation is not inconsistent with the text and context of the TDC.

⁴ In the spirit of being a good neighbor, Honey Bucket is in the process of evaluating options to move the temporary waste holding tank to another location outside the City limits, given the concerns expressed by staff about this tank to date. However, the presence or absence of the temporary waste storage tank onsite is not dispositive to characterize Honey Bucket's use, as further explained in this letter.

units are returned to the Site empty. The waste is pumped out of all units offsite before the restrooms are retrieved for cleaning and storage at the Site.

When portable restrooms are returned to the Site, service technicians are assigned to service them. The units are washed on the inside and outside. These employees then stock the route trucks with fresh water, toilet paper, and supplies needed to service the portable units rented out to various job sites. They also stock the onsite units with two full rolls of toilet paper, a stocked hand sanitizer dispenser, and 4.5 gallons of water with 1 oz of additive added to the tank in preparation for delivery to the customers. Each portable restroom unit has a 65-gallon tank. After cleaning and restocking, the units are stored in a ready line for delivery to the next customer.

As noted above, trucks that empty the portable restrooms of waste offsite return to the business site and temporarily transfer that waste in a standing storage container. Later, an additional truck empties the tank and delivers the waste to a final offsite destination for disposal. This component of the operation only uses a small amount of employee time, as most employees are engaged in the management, cleaning, and delivery of the portable toilet units and other industrial equipment.⁵

Other equipment is similarly returned, cleaned, repaired as necessary and stored in other portions of the Site.

C. The nature of any machinery used – TDC 31.070(2)(c).

A forklift is used onsite to assist with loading and unloading all rental equipment, including the portable restroom units.

The portable restrooms are cleaned onsite in a washing system that reclaims and recycles water into a private reclamation system so that no water escapes. When the water has been recycled multiple times, Honey Bucket pumps the system with one of the delivery trucks and disposes of it at an approved wastewater facility. Please see the attached letter explaining the washing system.⁶

D. Noise and odor characteristics, associated with the use or activity – TDC 31.070(2)(d).

The Site generates intermittent noise from typical human and vehicle movement during business hours. This includes noise associated with trucks driving onto the site, unloading those trucks, and moving the portable restrooms and other equipment into their respective storage spaces. Unlike at a waste storage or disposal facility, odor impacts from the empty portable toilets are effectively nonexistent beyond 10–12 feet from the units, a distance far shorter than the Site's buffer between the portable toilet storage areas and surrounding properties. The waste holding

⁵ See Section III.I for a more comprehensive breakdown of employee time between the Site's primary portable toilet rental operation and the waste staging tank management.

⁶ See Attachment A: Technical Letter Describing Wash Machine.

tank employs charcoal filters to capture any odors emanating during transfer between the tank and the trucks emptying or depositing into the tank. These charcoal filters generate a bubblegum fragrance that is the primary odor discernable within the tanks' vicinity. The wash machinery is a closed-loop system and produces limited noise and odor impacts beyond the sound of a power washer.

The other rental equipment at the Site does not generate notable odor impacts.

E. Outside storage of materials or products – TDC 31.070(2)(e).

All portable restroom units are stored outside in orderly rows in designated paved areas only. At peak, approximately 1750 units are stored on the southern portion of the Site; however, this number fluctuates seasonally depending on customer demand. Supplies for stocking the trucks, units, and restroom trailers are stored in a single container in a designated paved area. These supplies include paper products like toilet paper and paper towels, and toilet seat covers.

All other equipment is stored outside in stacks (fencing) or orderly rows. The shower units are stored outdoors under an awning attached to the maintenance and repair building.

F. Type of structures required – TDC 31.070(2)(f).

The Site has five structures. A maintenance and repair building is located in the Site's northwest corner to service portable toilet units, fencing, and other products and equipment rented from the Site. Just to the east sits the wash rack and a small storage shed. There are two additional structures in the lot's southeast corner.⁷ A portable office trailer onsite allows a supervisor to perform administrative duties. Next to the office is a portable container used to stock accessory goods for the replenishment of portable restrooms.

G. Character of activity to be conducted on the site – TDC 31.070(2)(g).

Honey Bucket's main onsite activity is the rental and storage of industrial equipment. The primary onsite activity is the loading/unloading, washing, and storing of portable restrooms and other industrial equipment rented from the Site.

H. Amount of parking required – TDC 31.070(2)(h).

The Site requires minimal onsite parking during the day. During working hours, the service and delivery trucks temporarily enter the site to pick up and deliver rental equipment. At nighttime,

⁷ On November 13, 2024, the City contacted Stoel Rives and Honey Bucket regarding necessary permits for structures on the site, including: (1) a commercial alteration permit; (2) a site utilities permit; and (3) unidentified permits outside Building Division control. See Email from Bryan LaVigne, Code Compliance Officer, City of Tualatin, to Allison Reynolds, Stoel Rives (Nov. 13, 2024). The City confirmed receipt of the commercial alteration permit on Nov. 22, 2024. See Email from Bryan LaVigne, Code Compliance Officer, City of Tualatin, to Scott Clark, Larson and Associates (Nov. 22, 2024).

all the trucks and hauling trailers are parked on a gravel area in the Site's southwest corner accounting for less than 25% of the total Site area.

I. Number of persons who would occupy the premises at any one time – TDC 31.070(2)(i).

Because employees are engaged in the delivery, pumping, and pickup of portable restroom units and other rented equipment, unless employees are actively loading or offloading delivery vehicles, only six employees regularly occupy the Site. These include three onsite equipment management personnel, an employee responsible for fencing, and a mechanic. A supervisor also performs administrative duties in the morning or evening in the portable onsite office trailer. At full capacity, there can be approximately thirty (30) employees at this site; however, given the delivery and servicing nature of the business operation, there are generally far fewer.

J. Any other information which the City Manager or designee determines to be relevant to a determination of the issue – TDC 31.070(2)(j).

Honey Bucket can provide any additional information helpful to the City in making this formal zoning determination.

IV. Legal Analysis

A. Honey Bucket's primary use at the Site is best characterized as a Wholesale Sales use. Any separate waste-related component of the use is ancillary and accessory to this primary use.

TDC 39.100 provides guidance on how to classify a site's uses as primary or accessory. Accessory uses are treated as part of a primary use and "are allowed in all zones" based on the status of the primary use in the zone. TDC 39.100(3)(c). Honey Bucket's primary use at the site, which is the rental of portable toilets and other industrial equipment to other businesses, is best classified as Wholesale Sales. To the extent that waste-related activities are considered a separate use, the comparatively de minimis waste-related component of Honey Bucket's use (which consists of a temporary waste staging tank and a truck that visits the site and leaves to deposit waste elsewhere) is accessory to the Wholesale Sales use and therefore also allowed wherever the primary Wholesale Sales use is allowed, like the ML zone.

TDC 39.450 defines Wholesale Sales uses as industrial uses for the "lease, and/or rental of products primarily to businesses. Onsite sales to the general public are limited." Honey Bucket's onsite operations are exactly that: the rental of industrial products primarily to businesses, with no onsite rentals to the general public.⁸ Onsite activities – the cleaning, restocking, and storage of the portable restroom units and other equipment – are all activities necessary for Honey

⁸ See also email from Allison Reynolds, Stoel Rives, to Bryan LaVigne, Code Compliance Officer, City of Tualatin (Jan. 14, 2025).

Bucket to be able to rent this equipment to third parties from the Site. Even the temporary waste holding tank located at the Site allows the portable restroom units to be returned to the Site without waste so that they can be more quickly prepared for their next rental. All these accessory activities, including the cleaning and maintenance of the portable toilets, support Honey Bucket's primary activity: the rental of industrial equipment to third parties.

If Honey Bucket were to incorporate onsite waste processing and disposal into its operation, we acknowledge that the land use at the site would include Solid Waste Treatment and Recycling use characteristics, as well as Wholesale Sales use characteristics.⁹ Then, Honey Bucket's use would be more akin to a situation regulated by the TDC's "Multiple Primary Uses" provision. This hypothetical operation would also fit more cleanly into the example use of a "portable toilet collection, storage and pumping." TDC 39.100(3). However, a land use describes only the activity occurring at a zoned site, not every activity that the owner of a site engages in in connection with their onsite activity. Honey Bucket intentionally structured its business model so that the Site would serve simply as the equipment rental portion of the operation. Waste processing and disposal, a critical part of any portable restroom rental business, occurs offsite.

In earlier discussions regarding Honey Bucket's use categorization, City staff interpreted the Wholesale Sales use category as limited to sales and rentals involving "construction and industrial equipment * * * used to perform construction or industrial tasks,"¹⁰ stating that "portable toilets, which are used in a variety of settings, do not appear to be 'construction or industrial equipment.'" ¹¹ This unnecessarily narrow interpretation results in an absurd situation where certain industrial sales and rental businesses are excluded from the Wholesale Sales use category (1) based on how their customers use the equipment, and (2) whether the goods being rented or sold are exclusively used in construction and industrial activities. If the City's interpretation is limited to tools physically used to build infrastructure or manufacture industrial items, it would exclude "machinery and tools" used to: (1) transport equipment and construction materials on site; (2) store construction materials on site; and (3) prepare construction materials for "the performance" of construction activities.

Furthermore, if Honey Bucket's use is excluded from the Wholesale Sales use category because Honey Bucket's portable toilets "appear in a variety of settings," then any business whose products might be used in a non-construction or industrial setting could be excluded from the Wholesale Sales use category on that basis. City staff reached this limiting interpretation not through the Wholesale Sales use provision's text itself, but through the provision's listed examples, which City staff themselves describe as "illustrative, and not exhaustive."¹² We

⁹ In this scenario, each primary use would be appropriately categorized and subject to the regulations for that use category. Here, this would require that the property be zoned to allow a Wholesale Sales use and Solid Waste use.

¹⁰ Letter from Kevin McConnell, City Attorney, City of Tualatin, to Allison Reynolds, Stoel Rives (Feb. 21, 2025) (emphasis added).

¹¹ *Id.*

¹² *Id.*

believe the City Council did not intend to narrow the Wholesale Sales use category so significantly when it adopted this provision of the Zoning Code, such that it would effectively exclude any use from qualifying as a Wholesale Sales use.

B. Honey Bucket’s rental business does not fit the characteristics associated with a Solid Waste Treatment and Recycling use as a primary use.

TDC 39.420 defines the scope of Solid Waste Treatment and Recycling uses as those that “receive, process and/or recycle solid waste materials.” TDC 39.420. The most applicable example use is “[p]ortable toilet collection, storage and pumping.” TDC 39.420(2). However, the mere mention of portable toilets within the Solid Waste Treatment and Recycling provision does not automatically mean that this use category captures all businesses dealing with portable toilets in any capacity. Honey Bucket’s primary use is not consistent with this use category, much less the referenced example use, for several reasons.

First, characterizing Honey Bucket’s use as a Solid Waste Treatment and Recycling use is inconsistent with the provision’s explicit text when read in its context. A local government’s interpretation must consider the text and context together; text cannot be considered separately from the broader context or the provision’s clear policy purpose.¹³ The Solid Waste Treatment and Recycling provision lists, as an example use, “portable toilet collection, storage and pumping.” TDC 39.420(2). This same provision includes two instances where it uses the less inclusive conjunction, “and/or”: (1) Solid Waste Treatment and Recycling facilities are described as those that “receive, process, and/or recycle solid waste materials,” and (2) a different example use is “waste composting and/or compost production.”

Had the City Council intended to include as an example use those portable toilet operations that engage in only one of the three listed activities, it would have done so with the appropriate conjunction, “and/or.” Instead, this example use covers only businesses engaged in all three activities—collection, storage, and pumping—because, when a zoning provision, “uses two different terms in the same provision, it is presumed that the enacting body intends two different meanings.”¹⁴ Honey Bucket intentionally maintains the waste disposal and processing components of its business offsite. Furthermore, because “the inclusion of specific uses in [an administrative] rule tends to imply an intent to exclude related uses not mentioned,” the inclusion of the portable toilet use example implies the exclusion of portable toilet business uses not fitting into that example.¹⁵

¹³ See § II (discussing the interpretive standards for a local government to interpret its own code).

¹⁴ *York v. Clackamas Cnty.*, 79 Or LUBA 278, 289 (2019).

¹⁵ *J.C. Reeves Corp. v. Washington Cnty.*, 31 Or LUBA 115, slip op at *6 (1996).

C. Mis-classifying Honey Bucket’s primary use as Solid Waste Treatment and Recycling effectively prohibits Honey Bucket’s operations (and similar businesses) in all City zones.

City staff’s interpretation would expand the Solid Waste Treatment and Recycling use category to apply to any business that deals with waste in any capacity and at any intensity.¹⁶ Such a broad interpretation is inconsistent with the explicit text of TDC 39.100(3)(c), which provides that accessory uses may exist alongside primary uses.

Staff’s interpretation, when taken to its logical conclusion, would also preclude any business dealing with waste in any zone. The TDC only specifies three sub-categories of waste uses (recycling collection centers, waste transfer stations and resource recovery facilities) that can be conditionally allowed in any City zone (specifically, either the ML or MG zone). If, as staff have concluded, these sub-categories represent the only types of permissible Solid Waste Treatment and Recycling uses, then all other uses classified as Solid Waste Treatment and Recycling—including “portable toilet collection, storage and pumping”—are prohibited City-wide.

We do not believe that implicitly prohibiting portable toilet storage and rental businesses in Tualatin was the City Council’s intent in enacting relevant provisions of the TDC. This result contradicts the City’s goal of fostering urban growth and a pro-business environment. Portable restrooms are required for any construction project, industrial sites, temporary “pop-up” events and businesses, and other unenumerated purposes where either sewage infrastructure does not exist, or parties have other reasons to want temporary restrooms over permanent restrooms. Tualatin currently has dozens of active and imminent construction projects,¹⁷ and Honey Bucket rents out portable restroom units to at least fifty-three (53) sites¹⁸ within the City of Tualatin, demonstrating the need for affordable and nearby access to portable toilet rentals.

V. Conclusion

For all the reasons set forth above, we respectfully request that the City Manager issue a formal code interpretation decision properly classifying Honey Bucket’s primary use as a Wholesale Sales use that is permitted outright in the ML zone. This is the interpretation consistent with the TDC, and it is the interpretation that is consistent with the City’s goals to foster a pro-business and pro-development environment in Tualatin. Honey Bucket’s business fills a vital role in the Tualatin business community, and Honey Bucket is eager to continue assisting developers and industrial clients alike in their construction, manufacturing, and event work in Tualatin.

Please let us know if we can provide additional information to assist with this request.

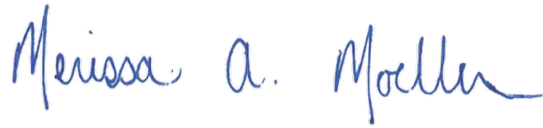
¹⁶ In earlier discussions, City staff provided no alternative that would recategorize Honey Bucket’s use as a Wholesale Sales use other than complete removal of the temporary waste transfer tank.

¹⁷ Projects, City of Tualatin, available at: <https://www.tualatinoregon.gov/projects> (last accessed May 21, 2025).

¹⁸ As of May 20, 2025. This number is expected to increase during the summer due to increased event demand.

Sherilyn Lombos
June 5, 2025
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Very truly yours,

A handwritten signature in blue ink that reads "Merissa A. Moeller". The signature is written in a cursive style with a large initial 'M' and a long, sweeping underline.

Merissa A. Moeller

cc: Matteo G. Crow

Encl.:
Attach. A: Technical Letter Describing Wash Machine

ATTACHMENT “A”



LOWRIDGE ON SITE TECHNOLOGIES, Inc.

Portable Toilet Wash Station

Application:

- Portable toilet wash station
- Water reuse

Description:

The portable toilet wash station is a closed loop wash water reuse station. Water from this station can be used for portable toilet washing and recharging the toilet for the next service. The "Wash Station" is a simple arrangement of below ground tanks (2) that collects wash water from the wash pad. Wash water is treated in the first of two tanks to reduce odor and potential harmful constituents. Treated wash water flows into the second tank where any solids are settled out. It is from this tank that wash water is pumped to pressure washers. Water from washing and rinsing portable toilet is collected on a concrete or asphalt apron and drained back into the in-ground tanks to start the process again.

Features and Benefits:

- Continuous aeration of reuse wash water
- Auto re-fill when liquid level drops
- No additional chemicals needed
- 110/220 volt versions
- Operating flow 0-15 gpm
- Through put flow up to 1300 gpd
- Economical installation
- Low operating cost
- Easily scalable
- Powers auto re-fill, two pressure washers, recirculation pump, reverse flush headworks

Toilet Wash Station Parts List:

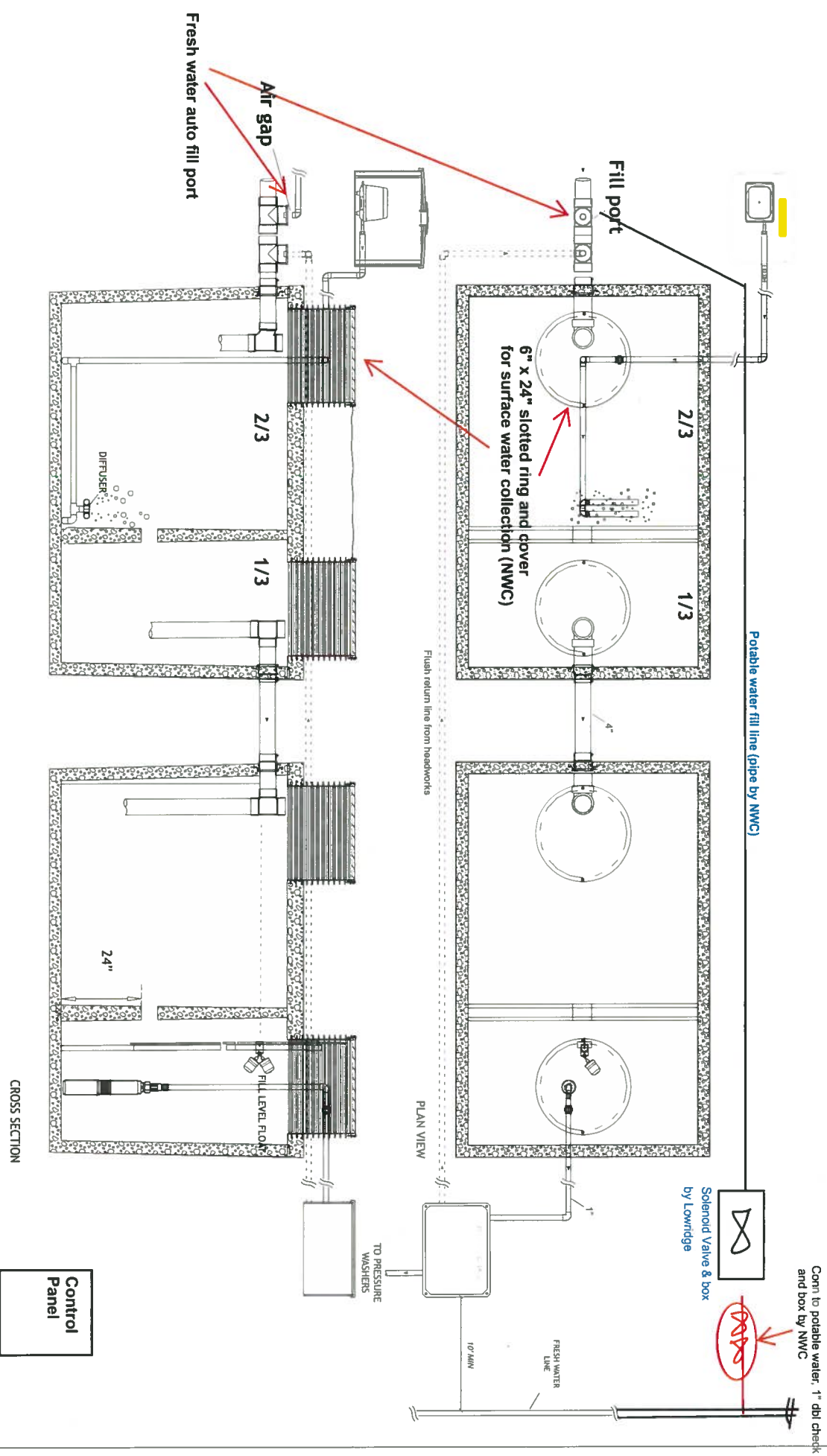
- Control panel
- Reverse flush headworks and housing
- Aerator and diffusers and housing
- Installation instructions
- Water re-fill solenoid valve and housing
- Float Switch

Components from Others:

- Two 1,000 or 1500 gallon tanks
- Tanks can be concrete or plastic
- Tank risers and lids
- Double check valve assembly
- 1" and 4" PVC pipe
- Electrical splice boxes
- Pressure washers

1500 Gallon Molded Polypropylene Tank

1500 Gallon Molded Polypropylene Tank



LOWRIDGE ONSITE TECHNOLOGIES

DRAWING ID: Wash Station

SCALE: NTS

DRAWN BY: DBM

CK BY: DAVE LOWE

DATE: 07.13.2023