



# **Public Utilities Department**

## **Division of Wastewater**

### **Memo**

**To:** Bob Mollette, Third Ward Councilman  
**From:** Richard Duncan, Director of Wastewater  
**cc:** Mayor, Chris Murphy  
**Date:** May 12, 2008  
**Re:** Power Washing Sanitation Trucks and Environmental Regulations

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Dear Mr. Mollette:

The mayor asked me to respond to your memo, dated April 21, 2008

All wastewater generated by the Portsmouth City Garage is discharged to sewers that flow into the Portsmouth Wastewater Treatment Plant. This includes all run off from washing sanitation trucks and other city vehicles.

The information in the OCAPP bulletin that you provided to the mayor only applies to discharges to "waters of the state" such as the Ohio River. Discharges treated by "POTWs," such as the Portsmouth Wastewater Treatment Plant, are specifically excluded.

I have highlighted some of the pertinent statements to this effect in the OCAPP bulletin.

As always, please feel free to contact me if you have any other questions regarding wastewater treatment.

Sincerely,

Richard Duncan, P.E.  
Director of Wastewater

**Bob Mollette**  
**3<sup>rd</sup> Ward Councilman**

1705 Franklin Blvd.  
Portsmouth, Ohio 45662

Phone: 740-353-0099  
email: bob@mollette.info  
website: www.mollette.info

Correspondence#: 08-014

April 21, 2008

Jim Kalb, Mayor  
728 Second Street  
Portsmouth, Ohio 45662

**Re: Power Washing City Sanitation Trucks and Environmental Regulations**

I am requesting pertinent information associated with the current practice of power washing City sanitation trucks on the City Garage property. I am not necessarily interested in the equipment used to power wash but the wastewater generated and disposal. I have enclosed a Fact Sheet dated May 2007 supplied by the Office of Compliance Assistance and Pollution Prevention for you review.

Wastewater generated from power washing appears to be considered industrial wastewater and may contain contaminants like detergents, oils, dirt, metals, solvents, or chemicals. Based on the enclosed fact sheet under the Clean Water Act, a company can not discharge industrial wastewater into "waters of the state" without obtaining a permit from the Ohio EPA. If the City does not properly manage wastewater, these contaminants can be carried directly into creeks, rivers, wetlands, or other surface waters, polluting the water.

Please consider the information enclosed and supply pertinent documentation on the waste generated and the point of discharge.

If you should have any questions contact me.

Respectfully,



Bob Mollette, 3<sup>rd</sup> Ward Council and Representative on City Council

rwm

Enclosure

cc:

- Christopher Murphy, Public Service Director
- Richard Duncan, Wastewater Director
- Bill Beaumont, Engineering Department
- Michael Jones, Solicitor
- Jo Ann Aeh, Clerk (Record)

Jim.  
The city garage does not discharge to the "waters of the state." It discharges to the wastewater treatment plant. These regulations do not apply to the city garage in any way. RD  
4/23/08

May 2007

## Mobile Power Washing and Environmental Regulations

Companies involved with power washing need to be aware of the environmental regulations that apply to them. These companies, commonly small businesses, can be involved in different activities such as power washing vehicles, equipment, buildings, etc. To help your company understand the environmental laws, this fact sheet outlines the requirements for managing wastewater from power washing. The environmental terms highlighted in bold are defined in the glossary at the end of this fact sheet.

It is important that you are aware of and in compliance with the regulations to ensure that your company is not subject to possible environmental violations or penalties. Under Ohio's water pollution control laws, a company can be fined up to \$10,000 per day for each day of violation!

### Environmental regulations that apply to power washers

Wastewater generated from power washing can contain contaminants like detergents, oils, dirt, metals, solvents or other chemicals. If a company doesn't properly manage wastewater, these contaminants can be carried directly into creeks, rivers, wetlands or other surface waters, polluting the water and threatening aquatic life.

Under the Clean Water Act, a company cannot discharge industrial wastewater into "waters of the state" without obtaining a permit from the Ohio EPA. Wastewater generated by power washing is considered industrial wastewater. By directly discharging or allowing wastewater to run into creeks, rivers, lakes, etc., power washing companies can be found in violation of the Clean

Water Act and Ohio's water pollution control laws. This includes companies that discharge wastewater into conveyance systems (for example, ditches or storm sewers) that lead to surface waters.

The Division of Surface Water at Ohio EPA is responsible for enforcing compliance with water pollution control regulations and for permitting wastewater discharge activities. Often, the local wastewater treatment plants (also called **POTWs**, short for publicly owned treatment works) are also responsible for regulating the companies that discharge wastewater to them.

### What are the options for handling wastewater from power washing?

Several options for handling wastewater are available to your company. Some options might be more practical than others and will depend on the characteristics of each job site where you are working. If you have any questions about managing wastewater, you should discuss your options with Ohio EPA's Division of Surface Water **BEFORE** you begin working at a site.

#### Option 1: Obtain permission to direct the wastewater to a publicly owned treatment works (POTW) through a sanitary sewer at the job site.

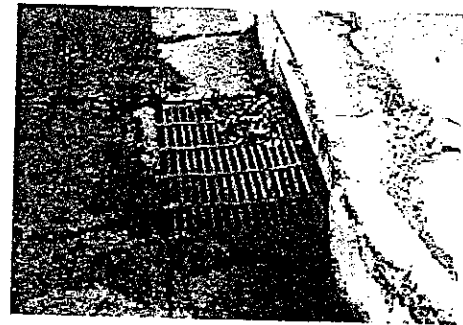
Inspect the site to find out if there is access to the POTW through a **sanitary sewer**. Drains and gutters found outside buildings, in parking lots or along the streets are usually **NOT** sanitary sewers. These are usually **storm sewers** that lead directly to a stream, lake or other water body. If you are

Even if you are using biodegradable soaps or detergents, your wastewater is still defined as an industrial wastewater and must be properly managed.

unsure, you can contact the local POTW to get more information about the sewer system in the area. You **CANNOT** discharge wastewater directly into **storm drains**.

Also, you should **NOT** discharge any wastewater into a drain or sewer system if you do not know where it leads. Do **NOT** let wastewater run outside a building or home into a storm sewer.

If you do locate a sanitary sewer, talk with the POTW to obtain permission to discharge wastewater from the job site into the sewer. A large wastewater treatment plant may have no problem in handling the wastewater from your power washing activities. ~~However, wastewater treatment plants are designed to handle sewage-related wastes and wastewater, not industrial wastes containing chemicals, metals, oils, etc.~~ It is important that they know what and when you are discharging. ~~Smaller treatment plants may have some special requirements for you to follow.~~ \* **OK.**



*Don't discharge your power washing wastewater into storm drains. This could lead to violations or penalties.*