

# Bob Mollette

## 3<sup>rd</sup> Ward Councilman

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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)

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.

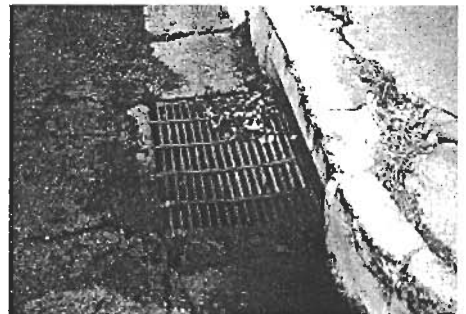
Inspect the site to find out if there is access to the POTW through a **sanitary sewer**. Drains and gutters found outside buildings, in parking lots or along the streets are usually **NOT** sanitary sewers. These are usually **storm sewers** that lead directly to a stream, lake or other water body.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



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

# Mobile Power Washing and Environmental Regulations

You MUST talk with the POTW to obtain permission to discharge wastewater to them. You need to find out what requirements may be needed BEFORE discharging wastewater to the POTW. You also need to discuss with the POTW the proper way to access the sanitary sewer system. This is usually done at the site by running wastewater into a utility sink or floor drain connected to the sewer. It's important to know that many cities have strict ordinances AGAINST accessing the sanitary sewer by lifting manhole covers.

## Option 2: Collect the wastewater from the job site and arrange for disposal at a POTW or industrial waste disposal facility.

If wastewater could enter a storm drain, other body of water or if there is no access to a sanitary sewer, you must collect the wastewater. After the wastewater is collected, you can arrange for disposal at the local POTW. Some POTWs have designated locations for dropping off trucked wastewater (usually called a "trucked waste disposal site"). Other POTWs may require that trucked wastewater be delivered directly to the treatment plant.

You need to contact the POTW ahead of time to find out where wastewater should be taken and about other requirements you may need to follow. The



*Drains in parking lots usually lead to storm sewers. You CANNOT discharge your power washing wastewater into a storm sewer.*

treatment plant may ask for sample results to confirm that wastewater does not contain high levels of contaminants that could harm their treatment system. In some cases, the wastewater may require pretreatment (e.g., filtration, removal of metals, oil or grease, etc.) before the POTW can accept it.

If you cannot find a local POTW that can accept your wastewater, you can arrange for disposal at an industrial waste disposal facility. Some of these facilities specialize in handling industrial wastewater. Check your local telephone directory for a listing of "industrial waste management" companies.

It is NOT acceptable to let wastewater run outside and sit in areas such as parking lots, driveways or catch basins to evaporate. By allowing wastewater to sit in these areas, contaminants can accumulate and run into a storm drain or body of water during a heavy rainfall.

## Option 3: Obtain a permit to discharge wastewater from the site to a creek, river or other water body.

A company that wants to discharge wastewater directly to a creek, river or other water body must obtain a permit from Ohio EPA's Division of Surface Water. The permit (called a National Pollutant Discharge Elimination System or NPDES permit) must be received before the business can discharge. A permit would be necessary for each job site where there would be a direct discharge to surface water. The permitting process can take several months.

In addition, wastewater treatment activities such as removing metals, detergents, oils or other chemicals would likely be required prior to any discharge. Units such as oil/water separators or holding tanks used for wastewater treatment or storage require a permit-to-install (also called a PTI) from Ohio EPA's Division of Surface Water.



*Don't discharge your power washing wastewater directly into a creek, river or other water body of the state unless you have a permit for the discharge.*

Obtaining an NPDES permit is an option for dischargers under Ohio's regulations, however, it is not necessarily practical for mobile power washing operations. The NPDES permit option might be more feasible for your business if you are going to be power washing regularly at a job site. This might include, for example, a situation where your company is working under a long-term contract to do regular power washing at a specific location. A company must keep in mind, however, other requirements that apply in this situation such as treatment and possible PTI requirements.

## What are some of the methods to collect power washing wastewater at a job site?

Ohio EPA does not require that a specific type of containment method be used for wastewater collection. However, the system must be adequately designed to prevent water from entering a storm drain or from running off-site. A containment pad, berms and pump system can be used to contain wastewater and divert it to a holding tank or sanitary sewer. Besides the following, there may be other methods you can use to manage wastewater at the site:

- Portable containment areas or wash pits can be made from waterproof tarps, heavy duty plastic or vinyl equipped with berms to prevent

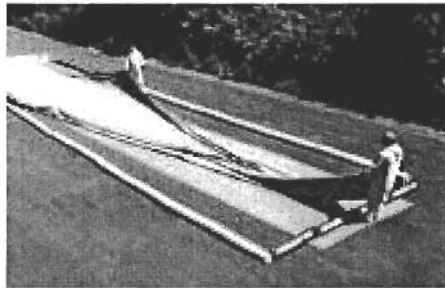
# Mobile Power Washing and Environmental Regulations

wastewater from running into storm drains or off-site. Materials that have been used for berms include wooden 2 X 4s, sand bags or tubes, capped fire hoses and PVC piping.

- Containment devices when power washing smaller pieces of equipment have included portable vinyl swimming pools, plastic 55-gallon drums on casters and flat metal containment pads.
- Some companies manufacture wastewater collection systems for power washing. These systems can range from portable wash pits to self-contained water recycling systems. Contact your local vendor for more information. Or, check your local directory under Pressure Washing Services and Equipment.
- Storm drain covers can be made of an impermeable barrier such as heavy duty vinyl or plastic, secured in place with materials such as concrete blocks or sand bags. Storm drain covers are also available through commercial vendors.
- Depending on the volume of water generated, pump systems may range from a wet-dry vacuum to a sump pump. You can create a natural catch basin to pump water from by setting up your containment system in an area that is slightly sloped. You need to ensure, however, that water does not wash over the berms.

## What else do I need to consider when I power wash?

You need to be aware of the EPA regulations that might apply to other wastes generated at a site. For example, if your company is power washing old paint off a building, paint chips need to be collected, evaluated and disposed of properly. Paint chips CANNOT be left on the ground at the job site. Old paint stripped off commercial buildings can contain metals (such as



*A portable containment pad can be constructed to collect wastewater from power washing. Photo courtesy of GMC Delco Cleaning Systems.*

lead, chromium, cadmium and mercury) causing it to be regulated by EPA as a hazardous waste.

Your power washing wastewater may be a hazardous waste in some situations. For example, if you are washing equipment that is being used at a hazardous waste cleanup site, wastewater may need to be handled as hazardous waste. If you are using chemicals like solvents or strong acids to clean, your wastewater may be a listed or characteristic hazardous waste.

Contact your local Ohio EPA District Office, Division of Hazardous Waste Management, with any questions about how to evaluate wastes or other hazardous waste requirements that might apply to your activities.

If you are working at a company that has been issued a **storm water permit** from Ohio EPA, this DOES NOT mean that you are also authorized to discharge your power washing wastewater into the storm sewer. Questions about storm water permits and discharge activities that are authorized under the permit should be discussed directly with Ohio EPA's Division of Surface Water.

Your power washing company should not be taking wastewater to another location for discharging, such as a car wash, unless you have obtained permission for this activity from that business and the local POTW.

You can also reduce the volume of wastewater your company needs to handle. Consider investing in recycling equipment that will allow you to reuse water. Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) can provide you with more information on companies that manufacture or supply recycling systems. For more information, call OCAPP at (800) 329-7518.

## What are some common violations that Ohio EPA sees?

Common violations include situations where power washing companies discharge wastewater directly into "waters of the state." This includes companies that pump or allow wastewater to run directly into storm sewers.

Another violation is failing to properly collect or dispose of wastewater. This includes companies that wash equipment in paved parking lots and allow wastewater to sit and evaporate.

By taking steps to ensure that wastewater from your power washing business is properly managed, you can avoid the possibility of fines or violations and help keep our water resources clean.

## Where can I get more help?

If you have any additional questions on proper disposal of wastewater, you can contact the Division of Surface Water at your local Ohio EPA district office. See map to find the office that covers your area.

Questions about discharging wastewater to a POTW should be addressed to the pretreatment coordinator at your local wastewater treatment plant.

If you have questions, you can also contact Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) for help. OCAPP is a non-regulatory office of Ohio EPA with a goal of helping small businesses comply with

# Mobile Power Washing and Environmental Regulations

environmental regulations and permitting requirements. If you are operating a small business with fewer than 100 employees, we can help you! For more information, contact OCAPP at (800) 329-7518, or visit our Web site at [www.epa.state.oh.us/ocapp/sb](http://www.epa.state.oh.us/ocapp/sb).

## GLOSSARY

**PTI:** Called a permit-to-install. A PTI is required from Ohio EPA's Division of Surface Water to construct any wastewater treatment or collection system. The PTI includes the technical and design requirements for construction of wastewater treatment/collection systems.

**POTW:** Called a publicly owned treatment works. A treatment plant that handles sewage and wastewater from homes and businesses. Many POTWs are owned and run by the city. Wastewater is treated at the POTW and then discharged, usually to a stream, river or lake.

**NPDES permit:** Called the National Pollutant Discharge Elimination System permit. This permit is issued by Ohio EPA to a company that wants to discharge wastewater into "waters of the state."

**Sanitary sewer:** Rest rooms and sinks in many homes and businesses (especially in cities) are hooked up to a sanitary sewer. Wastes travel through a system of pipes to a local POTW. Wastewater is treated at the POTW and then discharged, usually to a stream, river or lake.

**Storm sewer:** A collection system for rainwater. These types of sewers may include the gutter systems that you see along streets and roads or in parking lots. Rainwater collected in storm sewers travels directly into a stream, river or other water body without being treated.

**Storm water permit:** A permit issued by Ohio EPA, Division of Surface Water for certain industrial activities and businesses with outside processing, storage and/or material handling areas. Storm water contacting these areas can carry pollutants such as heavy metals, oils, and solvents to streams, lakes or other surface water. As part of the permit, the business must develop a Storm Water Pollution Prevention Plan to address storm water runoff.

**Waters of the state:** Water bodies like rivers, lakes, wetlands, creeks. Other systems that convey water such as storm sewers can also lead to waters of the state.

## ADDITIONAL NOTES

Photo used with permission of Delco Cleaning Systems of Fort Worth, 2513 Warfield St., Fort Worth, Texas 76106-7554, 800-433-2113, [www.dcs1.com](http://www.dcs1.com).



## OhioEPA District Offices

- CDO** Central District Office  
50 W. Town St. Suite 700  
Columbus, OH 43215  
(614) 728-3778
- NEDO** Northeast District Office  
2110 E. Auroa Rd.  
Twinsburg, OH 44087  
(330) 963-1200
- NWDO** Northwest District Office  
347 N. Dunbridge Rd.  
Bowling Green, OH 43402  
(419) 352-8461
- SEDO** Southeast District Office  
2195 Front St.  
Logan, OH 43138  
(740) 385-8501
- SWDO** Southwest District Office  
401 E. Fifth St.  
Dayton, OH 45402-6357  
(937) 285-6357