

# Know Your Ohio EPA Regulations Marina Wash Water

Marinas that perform or allow power washing need to be aware of the environmental regulations that apply to washing boats, trailers, personal watercraft, equipment, etc. To help you understand the environmental laws, this fact sheet outlines the requirements for managing your power washing wastewater.

# **Environmental Regulations that Apply to Power Washing**

Wash water generated by power washing is considered industrial wastewater. It can contain contaminants like anti-fouling paints, detergents, oils, dirt, organic matter, metals, solvents or other chemicals. If wastewater isn't properly managed, these contaminants can be carried into lakes, rivers, streams, wetlands or other surface waters, polluting the water and threatening aquatic life.

Under the Clean Water Act, a business cannot discharge industrial wastewater into waters of the state without obtaining a National Pollutant Discharge Elimination System (NPDES) permit from Ohio EPA. This includes discharges of wastewater into conveyance systems (for example, ditches or storm sewers) that lead to surface waters.

By directly discharging or allowing wastewater to run into creeks, rivers, lakes, etc., the marina can be found in violation of the Clean Water Act and Ohio's water pollution control rules.

Ohio EPA's Division of Surface Water (DSW) is responsible for enforcing the water pollution control rules and issuing permits for wastewater discharge activities. The local municipality is also responsible for regulating the businesses that discharge to the publicly owned treatment works (POTW).

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

To stay in compliance with Ohio EPA's rules, several options are available for handling your power washing wastewater. Some options might be more practical than others and will depend on the characteristics of your marina.

# *Obtain permission to discharge the wastewater to a POTW through a sanitary sewer at the marina.*

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 streets are usually **not** sanitary sewers. These are usually storm sewers that lead directly to a stream, lake or other water body. 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. If you are unsure, you can contact the local POTW to get more information about the sewer system in your area.



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



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

#### REMINDER

If you have been issued a storm water NPDES general permit from Ohio EPA, this **does not** mean that you are also authorized to discharge your power washing wastewater into the storm sewer. Discharge of industrial wastewater is not covered by your marina's storm water NPDES general permit. Questions about storm water permits and discharge activities that are authorized under the general permit should be discussed with DSW.

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#### IMPORTANT

It is **not** acceptable to let wastewater run outside and collect in areas such as parking lots, driveways or catch basins to evaporate. By allowing wastewater to collect in these areas, contaminants can discharge into a storm drain or body of water during a heavy rainfall. If you locate a sanitary sewer, you must request authorization from the POTW to discharge wastewater from your marina into the sewer. A large wastewater treatment plant may have no problem handling the power washing wastewater. However, wastewater treatment plants are designed to handle sewage, not industrial wastes containing chemicals, metals, oils, etc. It is important that they know what you are discharging. Smaller treatment plants may have additional requirements for you to follow.

You **must** talk with the POTW to obtain permission to discharge wastewater to their facility. You need to find out what requirements may be needed **before** discharging wastewater to the POTW. You also need to discuss the proper

way to access the sanitary sewer system — for instance, by discharging wastewater into a utility sink or floor drain connected to the sanitary sewer at the site. It's important to know that many municipalities have strict ordinances **against** accessing the sanitary sewer by removing a manhole cover.

## Install a closed-loop system to recycle and reuse water from your power washing operations.

Another option is to invest in a closed-loop recycling system to collect and reuse the power washing wastewater. Some companies manufacture wastewater collection and recycle systems specifically designed for power washing. Contact a vendor for more information. Ohio EPA maintains a voluntary list of *Vehicle and Equipment Cleaning Wastewater Recycling Systems*. Vendors can also be located by searching online for power washing recycle systems or boat washing recycle systems.

Some recycle systems may require a permit-to-install (PTI) from Ohio EPA's DSW. Contact your local Ohio EPA district office for the permit requirements for a specific system. If at any time you need to empty or reduce the amount of water in the system, be sure to read the information below regarding off-site disposal.

In addition to the environmental benefits of reusing water, investing in an on-site wastewater recycle system may save you money. Continually reusing water from the recycle system will greatly reduce the amount of water used and quantity of wastewater to be transported for treatment off-site.

# Install a tank to collect your power washing wastewater and arrange for off-site disposal.

If you plan to install a tank for your industrial wastewater, you will need a PTI from Ohio EPA's DSW prior to installation. The PTI application must be prepared by a professional engineer licensed in Ohio. The application should also include contracts with a waste hauler and the POTW or industrial waste management facility that will be accepting your wastewater.

You will need to arrange for disposal of collected wastewater. 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. Contact the POTW ahead of time to find out where wastewater should be taken and about other requirements you may need to follow. The treatment plant may ask for sample results to confirm that the wastewater does not contain high levels of contaminants that could harm their treatment system. In some cases, the wastewater may require pretreatment (for example, filtration, removal of metals/oil/grease, etc.) before the POTW can accept it. Pretreatment systems may also require a PTI prior to installation, so check with your Ohio EPA district office.

Industrial wastewater holding tanks or pretreatment systems require a permit-toinstall from Ohio EPA.

## REMEMBER

Wash water should not be taken to another location for discharge, such as a car wash, unless you have obtained permission for this activity from that business and the local sewer authority/POTW.

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

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### Use an independent mobile power washing contractor to perform boat washing services at your marina.

If you choose this option, ask prospective contractors if they have equipment to collect and treat the wastewater or a contract that allows disposal at an appropriate treatment facility. Also ask if they have a statewide PTI for their mobile system.

# *Obtain an NPDES individual permit to discharge industrial wastewater from the site to a lake, creek, river or other water body.*

If you want to discharge industrial wastewater from your power washing operations directly to a creek, river or other water body, you must obtain a NPDES individual discharge permit from Ohio EPA.

In addition, you would likely be required to install a pretreatment system to treat the wastewater to remove/reduce contaminants prior to any discharge. Wastewater storage tanks or treatment systems such as oil/water separators also require a PTI from Ohio EPA.

Although obtaining an NPDES individual permit may be an option for the discharge of power washing wastewater under Ohio's rules, it is not necessarily practical for most marinas to do so because of the time, expense and likelihood of needing a pretreatment system.

# What are some of the methods available to collect power washing wastewater at a marina?



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

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 wastewater from entering a storm drain or from running off-site. A permanent containment pad with berms and a pump system can be used. There may be other methods you can use to manage wastewater at the site in addition to the following:

- Portable containment areas or wash pits can be made from waterproof tarps, heavy duty plastic or vinyl equipped with berms to prevent wastewater from running into storm drains or off-site. Materials that have been used for berms include wooden 2x4s, sand bags or tubes, capped fire hoses and PVC piping.
- Storm drain covers can be made of an impermeable barrier such as heavyduty 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 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 Ohio EPA's rules that might apply to other wastes generated at a marina. For example, if your marina is power washing old paint off a boat, paint chips need to be collected, evaluated and disposed of properly. Paint chips **cannot** be left on the ground at the site. Anti-fouling paint stripped off boats can contain metals such as copper making it hazardous to aquatic life. In addition, if you power wash with chemicals like solvents or strong acids, you could generate a hazardous wastewater that requires specific on-site management. You can contact Ohio EPA's Division of Environmental Response and Revitalization (DERR) at (614) 644-2924 with any questions about how to evaluate wastes or other hazardous waste requirements that might apply to your activities.

# What are some common violations that Ohio EPA sees?

Common violations include situations where businesses discharge power washing wastewater directly into waters of the state without a permit. This includes companies that pump or allow wastewater to run into storm sewers. Another violation is failing to properly collect or dispose of wastewater. This would include marinas that wash boats or equipment in paved areas and allow wastewater to evaporate. If your marina also conducts boat maintenance activities, you will need



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to either obtain coverage under the multi-sector industrial general storm water permit or certify your boat maintenance activities are not exposed to precipitation.

# Where can I go for help?

If you have any more questions about proper disposal of power washing wastewater, you can contact DSW at your local Ohio EPA district office. See the map below to find the office that covers your area or go to *epa.ohio.gov/districts.aspx*. Questions about discharging the wastewater to a POTW should be addressed to the local wastewater treatment plant.

You can also contact Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) for help. OCAPP is an independent, non-regulatory office within Ohio EPA that provides businesses with free, confidential information about environmental regulations, compliance concerns and pollution prevention. For more information, call 800-329-7518 or visit our website at *epa.ohio.gov/ocapp*.

### **Central Office**

Lazarus Government Center 50 W. Town St., Suite 700 Columbus, OH 43215 (614) 644-3020

### **Central District Office**

Lazarus Government Center 50 W. Town St., Suite 700 Columbus, OH 43215 (614) 728-3778 (800) 686-2330

## **Northwest District Office**

347 N. Dunbridge Rd. Bowling Green, OH 43402 (419) 352-8461 (800) 686-6930

## **Northeast District Office**

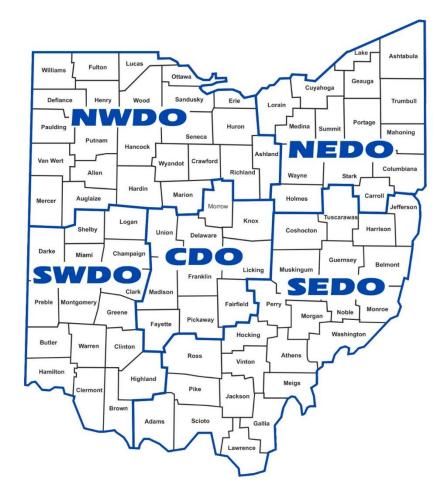
2110 E. Aurora Rd. Twinsburg, OH 44087 (330) 963-1200 (800) 686-6330

#### **Southeast District Office**

2195 E. Front Street Logan, OH 43138 (740) 385-8501 (800) 686-7330

## **Southwest District Office**

401 E. Fifth St. Dayton, OH 45402 (937) 285-6357 (800) 686-8930



Toll-free numbers are for citizens with questions or concerns about environmental issues. The regulated community should use the business line for routine business. Spills and emergencies should be reported to (800) 282-9378.