



JAMES D. KALB
MAYOR May 12, 2008

**CITY OF PORTSMOUTH
OFFICE OF THE MAYOR**

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728 SECOND STREET, ROOM 1
PORTSMOUTH, OHIO 45662

Bob Mollette
Third Ward Councilman
1705 Franklin Avenue
Portsmouth, Ohio 45662

RE: Correspondence Number 08-014

Dear Mr. Mollette,

In response to your correspondence, I have received the following information from our Wastewater Utility Director Rick Duncan. He states, "The City garage does not discharge wastewater to the 'waters of the state', it is discharged to the wastewater treatment plant." Per Director Duncan, this is a legally acceptable method of disposal and is clearly listed as "Option 1" on the regulation sheet, which you copied to me, for the disposal of wastewater.

If you had picked up the phone, stopped by my office or the Wastewater or Sanitation Department, or even read your own environmental regulation fact sheet, you would have saved me the time of writing this response, saved my assistant the time of typing, saved approximately 20-25 sheets of paper, saved copier toner, saved electricity, saved delivery time, etc. Perhaps we should all review our actions to become more environmentally friendly and save a tree or two.

Regards,

James D. Kalb, Mayor
City of Portsmouth

cc: Chris Murphy, Service Director
Rick Duncan, Wastewater Director
Bill Beaumont, Assistant Engineering Director
Solicitor Mike Jones
Honorable Council Members
Jo Ann Aeh, Clerk

JDK/wjj

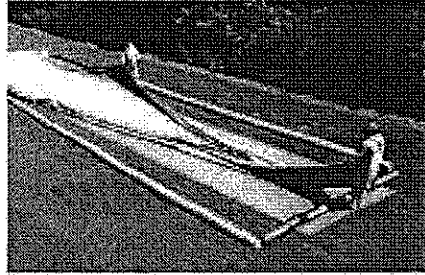
Mobile Power Washing and Environmental Regulations

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

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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.

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.



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. Aurora 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