

1st STOP CHECKLIST: POWER WASHING SERVICE

REQUIREMENTS & REGULATIONS

- [] There are rules about the disposal of wastewater from power washing. Please read the enclosed fact sheet about power washing. If you have questions, contact the **Ohio Environmental Protection Agency (EPA)** The Ohio EPA can be reached at **(614) 644-3020 for General Inquiries** or **(800) 329-7518 for the Small Business Hotline**. Information is also on-line at www.epa.state.oh.us.
- [] Power washing services are taxable. You must have a **VENDOR'S LICENSE**. Contact the **OHIO DEPARTMENT OF TAXATION** or Information is also on-line at <http://business.ohio.gov>.
- [] If you have questions about sales tax, contact the **OHIO DEPARTMENT OF TAXATION** at **(888) 405-4039 for Business Tax Assistance; 888-405-4089 for Tax Registration; or (800) 282-1782 for the Forms Request Line**. Information is also on-line at <http://tax.ohio.gov>.

For more help, contact your local Small Business Development Center (SBDC).

www.ohiosbdc.ohio.gov

REMEMBER TO CHECK LOCAL GOVERNMENT AGENCIES

THIS CHECKLIST IS ABOUT STATE REQUIREMENTS.

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.



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 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.

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

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



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

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 the individual job site. If you have any questions about managing wastewater, you should discuss your options with Ohio EPA **BEFORE** you begin working at a site.

Option 1: Obtain permission to discharge the wastewater to a 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 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 unsure, you can contact the local POTW to get more information about the sewer system in your area. You CANNOT discharge wastewater directly into storm drains.

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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 and into a storm sewer.

If you locate a sanitary sewer, you must request authorization from the POTW to discharge wastewater from the job site into the sewer. A large wastewater treatment plant may have no problem handling the wastewater from your power washing activities. 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 and when the discharge will occur. Smaller treatment plants may have additional requirements for you to follow.

You MUST talk with the POTW to obtain permission to discharge wastewater to the local wastewater treatment plant. 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. This is usually done at the site by discharging wastewater into a utility sink or floor drain connected to the sewer. It's important to know that many municipalities have strict ordinances AGAINST accessing the sanitary sewer by removing a manhole cover.

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

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 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 (e.g., filtration, removal of metals/oil/grease, etc.) before the POTW can accept it.

If you cannot find a local POTW that will 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 or perform an internet search for a listing of "industrial waste management" companies.

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.

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 **National Pollutant Discharge Elimination System (NPDES)** permit from Ohio EPA's DSW. The permit must be received before the business can discharge. A permit would be required for each job site with a direct discharge to surface water. The permitting process can take several months.

In addition, the wastewater would likely require treatment prior to any discharge. Wastewater storage or treatment systems such as holding tanks or oil/water separators also require a **permit-to-install (PTI)** from Ohio EPA's DSW.



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



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

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Although obtaining an NPDES permit is an option for dischargers under Ohio's regulations, it is not necessarily practical for mobile power washing operations. However, it may be feasible for your business if you are going to be power washing regularly at a single location. 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 site. Please be reminded that you may be required to obtain a PTI and install a wastewater treatment system.

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



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

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 job 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 site. Old paint stripped off commercial buildings can contain metals (such as lead, chromium, cadmium and mercury) that cause it to be regulated by EPA as a hazardous waste.

Your power washing wastewater may also 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.

You can contact Ohio EPA's Division of Materials and Waste Management (DMWM) at (614) 644-2621 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 NPDES 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 with Ohio EPA's DSW.

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

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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 without a permit. 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 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 DSW 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 local wastewater treatment plant.

You can also contact Ohio EPA's 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, contact OCAPP at 800-329-7518, or visit our website at epa.ohio.gov/ocapp.

Glossary

Permit-to-install (PTI): 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 such systems.

Publicly owned treatment works (POTW): A treatment plant that handles sewage and other wastewater from homes and businesses. Many POTWs are owned and operated by a city or county. Wastewater is treated at the POTW and then discharged, usually to a stream, river or lake.

National Pollutant Discharge Elimination System (NPDES) permit: A permit 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 for treatment.

Storm sewers: 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 NPDES permit: An NPDES permit issued by Ohio EPA for the discharge of storm water from 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. The permit requires the development of a Storm Water Pollution Prevention Plan to address storm water runoff.

Waters of the state: Water bodies like rivers, lakes, wetlands, and creeks. Other systems that convey water such as ditches or storm sewers commonly lead to waters of the state.

**Photo used with permission of Delco Cleaning Systems of Fort Worth, 2513 Warfield St., Fort Worth, Texas 76106-7554, 800-433-2113.*

Mobile Power Washing and Environmental Regulations

Ohio EPA District Offices

Central District Office

50 W. Town St., Suite 700
Columbus, OH 43215
(614) 728-3778
Fax: (614) 728-3898
Non-Emergency Complaints:
(800) 686-2330
epa.ohio.gov/districts.aspx

Northeast District Office

2110 E. Aurora Rd.
Twinsburg, OH 44087
(330) 963-1200
Fax: (330) 487-0769
Non-Emergency Complaints:
(800) 686-6330
epa.ohio.gov/districts.aspx

Northwest District Office

347 N. Dunbridge Rd.
Bowling Green, OH 43402
(419) 352-8461
Fax: (419) 352-8468
Non-Emergency Complaints:
(800) 686-6930
epa.ohio.gov/districts.aspx

Southeast District Office

2195 Front St.
Logan, OH 43138
(740) 385-8501
Fax: (740) 385-6490
Non-Emergency Complaints: (800) 686-7330
epa.ohio.gov/districts.aspx

Southwest District Office

401 E. Fifth St.
Dayton, OH 45402
(937) 285-6357
Fax: (937) 285-6249
Non-Emergency Complaints: (800) 686-8930
epa.ohio.gov/districts.aspx



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.