

PERMIT FACT SHEET

General Permit for Discharges of Exterior Vehicle Washwater from Commercial and Business-Related Operations to Groundwater

General Permit Discharge Permit Number: 21VW0000

Background

Maryland environmental regulations (COMAR 26.08.02.09, 26.08.04.01 & 26.08.07) require a permit for the discharge of any quantity of wastewater to ground and surface waters. Vehicle washwater is wastewater and therefore the onsite discharge of vehicle washwater requires a permit. This General Permit is for the discharge of vehicle washwater from commercial and business-related operations to groundwater.

General permits are discharge permits issued for classes of discharges which are the result of particular operations or treatment processes with similar effluent characteristics. General permits simplify the permit issuance process for the applicant and improves the efficiency of the Department's processing of applications. This results in better service to the regulated community by reducing the time to obtain permit coverage. In addition, there are cost savings for the applicant because general permit processing does not require newspaper publication informing the public of the proposed discharge.

This permit is for the discharge of <u>exterior</u> vehicle washwater to groundwater from commercial and business-related vehicle washing operations. A discharge permit is not required for the discharge of vehicle washwater from residences. Discharges to surface waters will not be authorized with this permit. Vehicles include automobiles, trucks, buses, grounds maintenance equipment, construction equipment, railcars, golf carts, all-terrain vehicles, motorcycles, watercraft and aircraft. The discharge of exterior vehicle washwater can be to the ground surface or into a subsurface disposal system. Discharge methods include drainfield, seepage pit/ dry well, land application, and other Department-approved disposal methods.

This general permit regulates the most common pollutants of concern that may be discharged in exterior vehicle washwater. The permit controls the discharge of these pollutants directly by required chemical testing of the washwater and indirectly by operation and maintenance conditions. The chemical tests and operation and maintenance requirements that are required in the General Permit are essentially the same as in an individual permit.

Permit Changes

The Department is revising this permit to better reflect reporting requirements. Vehicle washwater classes will now be defined by the amount of wastewater discharged per day instead of per week. Registration guidance for mobile washers and entities with multiple discharge locations has also been added to the permit. Commercial tunnel, roll-over and self-service, wand-type vehicle washing facilities will now be eligible to apply for this general permit.

Operations Not Authorized by this Permit

This permit strictly prohibits the discharge from the following washing activities because of the increased risk of volatile organic compounds (VOCs) being discharged in the washwater and the unpredictability of other pollutants that may be present.

- 1. Washwater discharged to surface waters of the State (via drainage ditch, streams or stormwater drains).
- 2. Washwater from the interior washing of tank trucks, tractor trailers, railcars, garbage trucks, open-bed trucks or any other vehicle interior receptacle.
- 3. Washwater from cleaning vehicular engines, power trains, undercarriages or parts thereof.
- 4. Wastewater generated from the flushing of vehicular radiators or engine cooling systems.
- 5. Washwater generated from washing vehicular parts with organic solvents.
- 6. Washwater generated from washing of vehicles with exposed engines, such as, but not limited to construction and earth-moving equipment.
- 7. Facilities that discharge an average monthly volume of more than 5,000 gallons per day require authorization to discharge via an individual discharge permit.

For information on obtaining individual permit coverage for these or other washing activities that cannot be authorized by this General Permit, please call 410.537.3778

Vehicle Washwater Management Options Not Required by a Discharge Permit

If *NO* washwater is discharged onsite, then a discharge permit is not required. The following washwater management options do not require discharge permit authorization:

- 1. Discharging washwater to the sanitary sewer, if available
- 2. Containing, collecting and transporting washwater offsite for appropriate treatment and disposal.

Vehicle Washing Classes

This permit keeps 4 classes of vehicle washing operations but has updated the average monthly volume per day of washwater associated with each class. Vehicle washing classes will now be defined by the daily discharge instead of weekly discharge. This change makes reporting easier for those facilities that are required to report flow in gallons per day on their discharge monitoring reports.

Chemical testing of the discharged vehicle washwater is required and the frequency of testing is based on these 4 classes.

<u>Class I</u>	<u>Class II</u>	<u>Class III</u>	<u>Class IV</u>
Less than 100	100 to less than 500	500 to less than	1,000 to 5,000
gallons/day	gallons/day	1,000 gallons/day	gallons/day

Washwater Chemical Testing and Numeric Discharge Limits

This permit requires washwater testing and sets numeric limits on pollutants of concern that may be discharged in vehicle washwater. The tests and numeric discharge limits proposed for this general permit are the same as is currently found in individual discharge permits.

The two required tests are Total Petroleum Hydrocarbons (TPH) and Volatile Organic Compounds (VOC). Washwater is tested after any treatment and must meet the numeric limits before its onsite discharge. A sampling port, located after treatment and before discharge, is typically required.

The TPH analysis tests for a wide range of petroleum hydrocarbons. The numeric discharge limit is 15 mg/l (parts per million) and is based on the concentration achievable by traditional oil separation technology. While this permit does not require any specific treatment technology, experience has shown that a properly sized and maintained grit trap and oil water separator can meet the 15 mg/l limit.

The VOC analysis tests for a suite of pollutants many of which have federal and state drinking water standards (limits). The permit's VOC numeric discharge limits are based on these drinking water standards. VOC chemicals include those used in combustion engines and other petroleum products and degreasers. Degreasers typically contain a class of chemicals called chlorinated hydrocarbons. Two common degreasers are trichloroethene (TCE) and tetrachloroethene/perchloroethene (PCE/'perc'). Some VOCs such as benzene, an ingredient in gasoline, and PCE have permit discharge limits as low as 5 μ g/l (parts per billion). Oil/water separation technology which is effective at meeting TPH discharge limits will not remove VOCs from washwater. These chemicals are one of the reasons that

degreaser use is prohibited, and engine washing won't be authorized with this *General* permit. In addition to meeting the individual discharge limits, the sum of the quantity of individual regulated VOCs (Total VOCs) detected in the washwater cannot exceed 100 μ g/l. The 100 μ g/L limit is based on achievability of common, readily available treatment technologies such as air stripping.

The frequency of washwater testing is based on the Vehicle Washing Class. Each Class requires both TPH and VOC testing.

Vehicle Washing Class Washwater Discharge Limitations TPH & VOC tes

Class I	less than 100 gallons/day	Only required with initial application
Class II	100 to less than 500 gallons/day	Every 6 months
Class III	500 to less than 1,000 gallons/day	Every 3 months
Class IV	1,000 to 5,000 gallons/day	TPH: Monthly VOCs: Every 3 months

Additional Changes

The permit has added authorization to register as a mobile washer or to apply for one permit for multiple sites for "Alternative Registrations" (Part III.B). A mobile washer will be required to include the location of each mobile washing site in the logbook, in addition to logbook requirements listed in Part V.B.4. A permittee will be eligible to register multiple locations under one permit, provided each location seeking registration is owned by the same entity. Under this registration, each different location will be treated as a separate outfall and will be required to keep a logbook at each site, submit DMRs annually, if applicable and keep a copy of the registration letter onsite.

For more information:

This permit can be found at <u>https://mdewwp.page.link/VWGP</u>. If you have any questions – please contact Tracy Rocca-Weikart of the Wastewater Permits Program at 410.537.3778 or by email at <u>tracy.rocca-weikart@maryland.gov</u>.