



Facts About..... Draft General Permit No. 16-VW

Maryland's Proposed General Permit for Discharges of Vehicle Washwater from Commercial and Business-Related Operations - to Groundwater (i.e. onto the ground or into the subsurface)

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 proposed General Permit is for the discharge of vehicle washwater from commercial and business-related operations to groundwater.

The Department issues both *individual* and *general* permits. *General* permits are developed for business operations or treatment processes that discharge wastewater with similar chemical characteristics. *General* permits typically require testing of the discharged wastewater for pollutants of concern, numeric limits that must be met, and operation and maintenance requirements. *Individual* and *General* permits are both effective for 5 years.

A General permit simplifies 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.

Until now, the Department has permitted the onsite discharge of vehicle washwater from commercial and business-related vehicle washing operations via individual discharge permits. Because the wastewater discharges from most vehicle washing operations have similar chemical characteristics and the permits have similar testing and permit conditions, this category of dischargers is appropriate for coverage by a general permit. Business owners will have the choice to apply for individual or general permit coverage.

Who is this General Permit for?

This permit is for the discharge of exterior 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, water craft 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.

What Types of Operations are not Authorized by this Permit?

This permit strictly prohibits the discharge from the following washing activities because of the increased risk of 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 commercial tunnel, roll-over, and self-service, wand-type vehicle washing facilities.
7. Washwater generated from washing of vehicles with exposed engines, such as, but not limited to construction and earth-moving equipment.
8. Facilities that discharge more than 25,000 gallons per week 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

Are There Options for Managing Vehicle Washwater that Doesn't Require a Discharge Permit?

YES: 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 establishes 4 classes of vehicle washing operations based on the average volume of washwater discharged per week. 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 500 gallons/week	500 to less than 3,000 gallons/week	3,000 to less than 7,000 gallons/week	7,000 to 25,000 gallons/week

What Will the Permit Regulate?

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.

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 ug/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 ug/l.

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 testing requirements
Class I	less than 500 gallons/week	Only required with initial application
Class II	500 to less than 3,000 gallons/ week	Every 6 months
Class III	3,000 to less than 7,000 gallons/ week	Every 3 months
Class IV	7,000 to 25,000 gallons/ week	TPH: Monthly VOCs: Every 3 months

What costs are associated with this permit?

There will be cost savings for the permittee in obtaining *General* permit coverage compared to *Individual* permit coverage. Processing an *individual* permit includes the costs of publishing notices in a local newspaper informing the public of the permit application. These costs for publication are paid by the applicant. With *general* permit processing, there is no requirement for these public notices and these costs to the permittee are eliminated. Costs associated with washwater testing will be the same as in an Individual permit, and the frequency of testing will be based on the 'Vehicle Washing Class.'

Application and annual fees will still be the same as in Individual Permit coverage. These are;

Application Fees:	Class I, II & III	\$ 100.
	Class IV	\$ 200.
Annual Fees:	Class I, II & III	\$ 100.

Class IV \$ 400.

For more information:

The proposed permit is available for review at <http://bit.ly/16-VW>. You may request a copy of the proposed permit by calling Mike Eisner or Tracy Rocca-Weikart of the Wastewater Permits Program at 410.537.3778 or by email to the following address: mike.eisner@maryland.gov.

You have several opportunities to comment on this proposed permit. You can submit written comments to Mike Eisner at Maryland Department of Environment, Wastewater Permits Program, 1800 Washington Blvd., Baltimore, MD 21230 or email your comments to the above email address. The deadline for receipt of written comments is June 22, 2016. You can also provide comment in person at a public hearing scheduled for Wednesday June 15, 2016 in the Aqua and Aeries Conference Rooms from 1 to 3 pm, at the Maryland Department of Environment (MDE), 1800 Washington Blvd, Baltimore, MD 21230. Any hearing impaired person may request an interpreter at the hearing by contacting Darlene Mitchell, Office of Fair Practices at (410) 537-3964 at least ten working days prior to the scheduled hearing date. TTY users should contact the Maryland Relay Service at 1 800 201-7165.