



Controlling Pollution from Mobile Washers

**NACWA Pretreatment and Pollution Prevention
Workshop
May 17, 2013**

Presented by: Tim Potter

**Central Contra Costa Sanitary District
Environmental Compliance Program**



Presentation Overview

- Overview of CentralSan
- What's the Problem with Mobile Washers?
- Review Mobile Washer Issues
- Potential Control Strategies
- Summary & Questions



CentralSan

- Sanitary sewer collection and treatment service for residential, commercial, and industrial customers in central Contra Costa County, CA
 - No Significant Heavy Industry
- More than 460,000 population and 1500 miles of collection system
- Strong Compliance Record
- Stormwater compliance services under contract with NPDES co-permittees



What's the Problem with Mobile Washers?

- Cheapest Wastewater Management Strategy is Gravity Flow
 - Protect storm water drainage system
- If Discharge to Sanitary Sewer, Cheapest Strategy is No Treatment
 - Equity for fixed facilities
 - Control pollutants of concern
- Easiest Way for Mobile Washers to Access Sanitary Sewer is Pop a Manhole
 - Authorize discharge to sanitary sewer
 - Manage location of discharge



Review Mobile Washer Issues

- Surfaces Cleaned
 - Primarily Outside
 - Inside Washed to Outside
- Pollutants Generated
 - Cleaning Chemistry
 - Pollutants Mobilized from Surfaces

Shopping Carts





Mat Washing



Gas Stations



Dumpster Areas



Sidewalks & Plazas



Fleet Washing





Shop Floor Cleaning



Shop Floor Stripping



Spill Clean Up





Parking Garages



09.21.2010 14:54



Miscellaneous







08.09.2010 08:44





Pollutants Generated

- Usual Suspects
- Maybe More...

O&G and Simple Green



O&G and Caustic



O&G and Caustics



O&G, Metals, Solvents and Solids



Solids and ?



Solids



“Earth Friendly” Solvent



Chlorinated Solvent



07.20.2010 09

Formaldehyde Based Solvent



Acid






Potential Control Strategies

Uniform Standards

- Level Playing Field
- Foundation for Enforcement



Best Management Practices (BMPs)

Precleaning
Containment
Recovery
Treatment
Disposal
Training



08.08.2010 10:30

























CCCCSD Mobile Washer Permit Program

- Equity for fixed facilities
- Treatment appropriate for pollutants of concern
- Authorizes access to sanitary sewer
- Documents compliance requirements



Mobile Washer Permit Elements

- Simple Application Form
- 2-Page Permit (Front to Back with few attachments)
 - Identifies types of surfaces
 - Notification Requirements including sanitary sewer discharge location
 - Records
 - Identifies Treatment System
 - Communicate BMPs



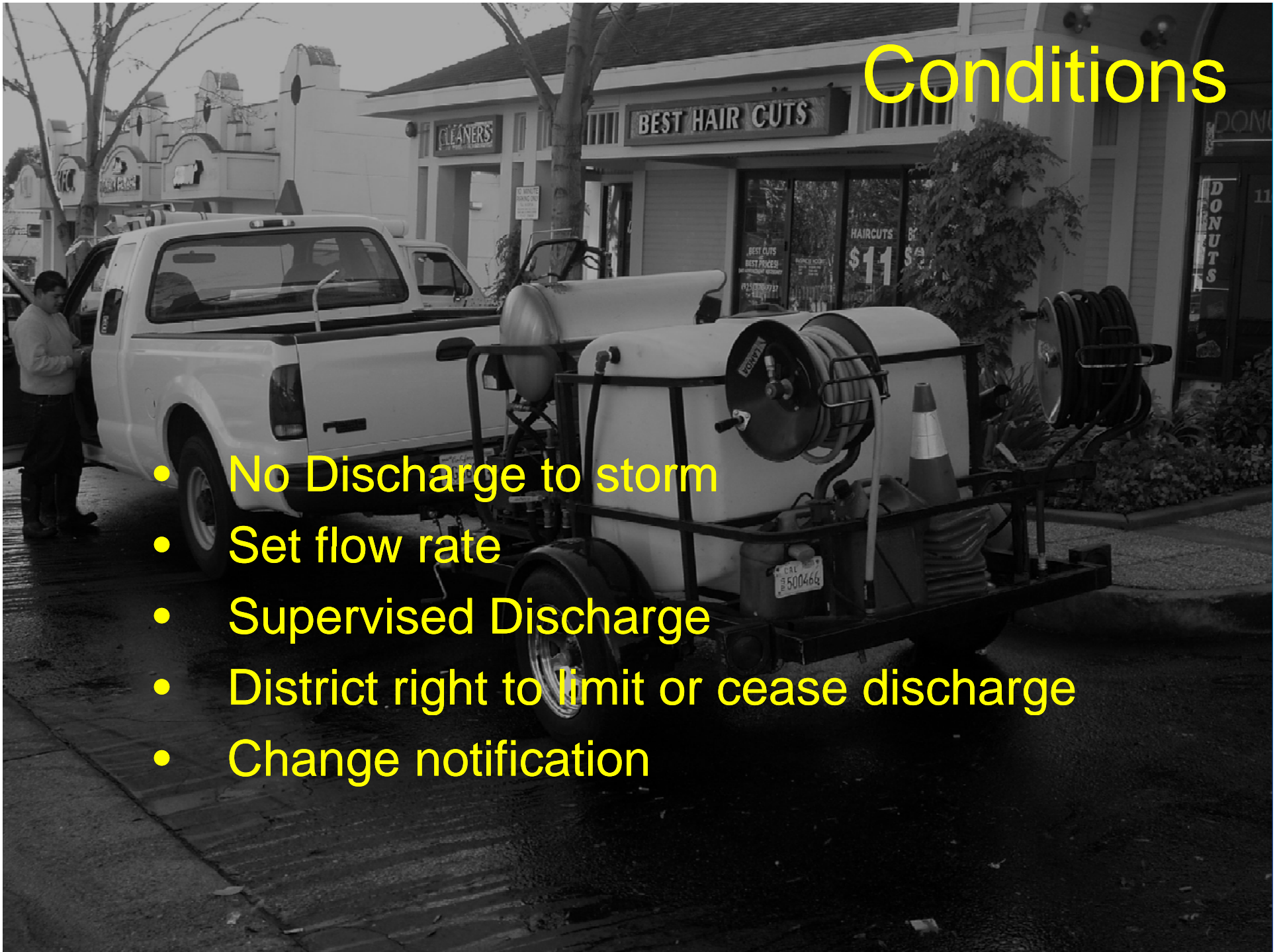
Authorized Surfaces

Currently list out the authorized surfaces, based on application and ability of pretreatment system

Sidewalks and Plazas	Parking Garages/Lots	Gas Stations	Kitchen Equipment
Trash Areas	Vehicle / Fleet Washing	Cart Washing	Other – Specify

Conditions

- No Discharge to storm
- Set flow rate
- Supervised Discharge
- District right to limit or cease discharge
- Change notification





Special Approvals

- Discharge to manholes requires specific written authorization by the District
- Certain wastewater needs written pre-approval from the District prior to discharge
 - Engine/equipment degreasing
 - Acid cleaning
 - Other activities and surfaces not listed



CCCCSD Mobile Washer Permit Benefits

- Permitted Mobile Washers Identified on CCCCSD Webpage
- Mobile Washes use to market services and secure contracts
- Recognized regionally as a standard for good work practices



Summary

- Mobile washers can be a significant source of water pollution
- Mobile washing can be done without polluting surface waters using BMPs
- Direct mobile washing wastewater to sanitary sewer using standards/BMPs
 - Can be managed under BMP permit



Questions?

Central Contra Costa Sanitary District

Jeff Skinner
Environmental Compliance Inspector II
Jskinner@centralsan.org
(925) 335-7720

Tim Potter
Environmental Compliance Superintendent
tpotter@centralsan.org
(925) 229-7380