

## Questions from Students in EPA/Lead/RRP Classes:

**Question: 1. When is collection of power washing (pressure washing) waste liquid needed and 2. how does one contain it and 3. How does one handle the waste water?**

**Answer 1: The wastes from power washing must be collected and properly disposed of. The greatest environmental damage and greatest enforcement occur when the liquid waste from power washing can enter a storm drain or other water course.** Power washing wastewater that enters storm drains flows directly into lakes, rivers, and streams. This water is not treated or cleaned to remove pollutants. Pollutants discharged to the storm drain harm fish and wildlife and contaminate recreational sites and drinking water supplies.

### Discussion:

Attached in PDF form are a joint DEP/DPH/OSHA pamphlet, some applicable DEP regulations 22a430 1-4, and 6-8, and DEP guidance document on pressure washing and "misc guidance" which discusses the requirements to discharge in a sanitary sewer without a registration or permit.

This is an extremely complex subject. Call the DEP Water Program at (860) 424-3003 for further information and the pamphlet attached has other agency contact information. Also contact the local municipal Sewer Authority to find out about discharges into sanitary sewers. Properties located near public and private wells and other drinking water sources are likely to have further local restrictions.

### Answer 2-3. How to collect and dispose of the waste:

Throughout the country liquids from power washing buildings are routinely collected. Many commercial setups are available.

The simplest approach is to use a plastic channel with the leading edge secured under the dripline and direct the water down hill to a sump. 6 mil or heavier poly plus studs or 4x4s can be used for the channel. The sump can be made from a 5 gallon pail dug into the ground at end of the channel to collect the liquid. (Depending on the volume, a larger container such tub or a 30 gal drum may be needed as the sump.) Loose soil can also be used to form a berm under the plastic at strategic locations, such as the uphill end of the channel. A pump and discharge hose of appropriate size are used to transfer the liquid. For small amounts, a wet vac is useful as well. Possible points of pump discharge are:

- a. POTW discharge (sanitary sewer) where permitted (Note 1)
- b. Or drums or other disposal vessel for collection by a licensed hauler.

At the end of the process, sweep down or hose down any solids remaining in the channel and collect these in the sump for proper disposal.

Under some circumstances, filtration of the wastes may be desirable. This can be done using an in-line pressure filter, finest porosity that the pump can handle. 10 and 25 micron in line filters are commonly available. If the effluent from the filter is hazy, then a 5 micron filter may be needed. The sediment on the filter may be a hazardous waste.

If the house has lead paint on the exterior, then the wastes must be evaluated by lab analysis for the TCLP test to determine if the waste is a Hazardous Waste as regulated by DEP and EPA regulations. If the extractable lead is 5 mg/liter or greater, then the waste is Hazardous.

If you dispose of the waste in the homeowners sanitary sewer line, do not use sinks or bathtubs; use toilets. Always get the owner's permission first.

### More Discussion:

Beware of houses with pre-existing lead contamination in the soil. Most pre-1978 houses already have substantial amounts of lead dust within 2 ft of the dripline. A homeowner may claim you contaminated his soil by your painting-prep operation. With older houses, it is prudent to take a soil sample on each side by the dripline before your work, document the date and exact location of the samples. Put these samples with the documentation in the custody of a lab for possible future tests. If there is a complaint after your work claiming you contaminated the soil, then take after work samples in the same locations and have the lab run before vs after samples.

DEP is presently not enforcing where relatively uncontaminated power wash liquid waste from washing a home on residential property is allowed to percolate into the ground on the residential property as long as the waste stays on the property and does not enter a storm drain or water course. However, the joint pamphlet from the state does not mention this option and says it has to be collected. (See the attached pamphlet.)

Relatively uncontaminated means that this is not a lead painted house and at the most, that only some bleach or detergent was added to the wash liquid. Any water with hazardous contaminants such as acid added would need to be collected.

Discharges from commercial property, from washing vehicles, boats or from washing equipment could not be handled this way and would see stricter enforcement.

In most cases, the waste could be disposed of in a sanitary sewer (POTW). This waste would be classified as "miscellaneous wastewater"

**\*\*MISC Wastewater\*\***

**means a discharge to a sanitary sewer (and only to a sanitary sewer) of no more than 50,000 gallons per day (or up to 2% of the receiving POTWs design flow, whichever is less) of wastewater resulting from any of the following processes or activities: air compressor condensate, air compressor blowdown, building maintenance wastewater, contact cooling and heating wastewater, cutting and grinding wastewater, fire sprinkler system testwater, nondestruct testing rinsewater, and undesignated MISC wastewater.** The PDF guidance document attached "misc guidance" has specs that the waste must conform to meet the misc requirements.

\*\* Under CGS Section 22a-430, any person who wishes to discharge any type of wastewater to the waters of the state *i.e.*, surface waters, groundwaters or a Publicly Owned Treatment Works (or POTW, including its sanitary sewerage system) must first obtain a wastewater discharge permit from the Commissioner of the Department of Environmental Protection (DEP). To comply with this requirement, such persons may obtain either an *individual permit* or, as available, a *general permit*. An individual permit is issued to a specific facility at a specific site with terms and conditions specific to that permittee and is typically applied to the most significant discharges warranting a detailed application and review. By contrast, general permits are issued to authorize groupings or categories of wastewaters which are minor in nature, thereby limiting DEP involvement and streamlining the application process. A general permit is available for Miscellaneous Discharges of Sewer Compatible or MISC Wastewater. **? MISC Wastewater\*\* means a discharge to a sanitary sewer (and only to a sanitary sewer) of no more than 50,000 gallons per day (or up to 2% of the receiving POTWs design flow, whichever is less) of wastewater resulting from any of the following processes or activities: air compressor condensate, air compressor blowdown, building maintenance wastewater, contact cooling and heating wastewater, cutting and grinding wastewater, fire sprinkler system testwater, nondestruct testing rinsewater, and undesignated MISC wastewater.** These processes and activities are defined in Section 2 of the *General Permit for MISC Wastewater* and on the specification sheets included as Appendix B to this guidance document.

Above is a simplification and not intended as legal advice. This information represents our understanding of current regulations and practices and is provided to our students at no cost. The reader is urged to read the regulations and consult with state and local authorities. In all cases, the possibility of civil liability exists for the contractor who may contaminate property which can not be anticipated in the guidance offered. Use by the students and by 3<sup>rd</sup> parties is at their own risk. Practices and regulations may change and it is up to the student to stay abreast of the changes.