



| <i>Environmental Guideline</i> Cleaning & Washing Vehicles & Equipment | |
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| Activity Description |
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| This guideline outlines requirements for the cleaning of vehicles and equipment, including the storage, handling, and disposal of materials used for this purpose. |

| Potential Environmental Risks |
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| The following environmental concerns are associated with this activity: <ul style="list-style-type: none"> • Release of contaminants in wash water to sewer, waterways, or soils, such as: <ul style="list-style-type: none"> ○ Oil, grease, and fuels ○ Soaps, detergents and surfactants ○ High pH solutions ○ Sediments ○ Chemical contaminants |
| Potential consequences from performing the activity incorrectly: <ul style="list-style-type: none"> • Environmental damage, costly site clean-up and remediation, property damage. • Possible regulatory non-compliance, Notice of Violation and related [financial & non-financial] penalties. |

| Critical Operating Requirements |
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| <u>A. General Requirements</u> <i>Responsible: All Staff</i> |
| Prohibited Activities <ul style="list-style-type: none"> • Outdoor washing is prohibited, except at designated wash pads engineered to contain and treat wastewater and direct it to the sanitary sewer, or in very limited situations as outlined in the <i>Outdoor Washing Requirements</i> section below. • Discharge of wash water to the storm sewer or waterways is prohibited, unless the discharge is authorized and permitted under State discharge regulations for your sector- or check Denver’s Municipal Permit (the “MS4”) |
| General Considerations <ul style="list-style-type: none"> • Each operator conducting cleaning/washing activities is responsible for understanding the applicable regulations and managing their activities accordingly; this Environmental Guideline is meant as guidance only and does not supersede any regulations. • Review the Municipal Facility Runoff Control Plan (MFRCP) for your facility and be sure to observe all required and recommended practices. • Use dry cleaning techniques as much as is feasible (dry cleaning techniques do not use water or other “solvents”). • Use only cleaning chemicals that meet your organization’s EPP guidelines for low toxicity and low impact to the environment. |

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Critical Operating Requirements

A. General Requirements *Responsible: All Staff*

- Minimize mixing of wash water with stormwater through the use of berms, grading, overhead cover and other best management practices (BMPs).
- Practice good housekeeping procedures to keep the wash area clean and free of waste.

Indoor Washing Requirements

- Use designated wash facility indoors. The wash facility should be designed and operated such that:
 - All wastewaters are captured and discharged to a sanitary sewer drain within the building
 - All wastewaters flow through appropriate pretreatment device(s) for separation of oils and grease and settling of solids (e.g. oil/water separator, sand trap) prior to leaving the property.

Outdoor Washing Requirements

- Outdoor washing is prohibited unless at least one of the following requirements is met:
 - A dry cleaning method that does not use water is employed,
 - Washing is performed on a relatively impervious surface (e.g. concrete, plastic) and wash water is collected and appropriately pretreated prior to discharge to the sanitary sewer, either on site or off site via a licensed wastewater disposal contractor.
 - Wash water is discharged in a manner that is authorized and permitted under applicable State discharge regulations or Denver’s Municipal Discharge Permit, the MS4.

Training requirements

- All employees performing vehicle or equipment washing must receive basic on-the-job training to safely operate the cleaning equipment being used.
- All employees performing vehicle or equipment washing must receive basic on-the-job training in spill response and stormwater protection.

Storage & Materials Management Requirements

- Maintain legible labels and markings on all containers of cleaning products.
- If possible, store cleaning solutions indoors, utilizing secondary containment when appropriate.
- Materials stored outdoors must be isolated from contact with precipitation and stormwater to prevent stormwater pollution.

B. Planning Requirements *Responsible: Supervisors & Operations Managers*

B1. Read or review the Municipal Facility Run-off Control Plan (MFRCP) for your facility to determine what activities are allowed, what activities may be prohibited, and how to prevent stormwater pollution.

- If applicable, the operator will need to decide whether this guideline and their MFRCP provide sufficient guidance or if they need to generate their own work instructions for approval by DEH and the MS4 program manager.

B2. Purchase and use only cleaning products that meet your organizations Environmentally Preferable Purchasing (EPP) standards.

B3. Maintain adequate supplies of spill response equipment and materials in locations where spills are likely to occur.

C. Critical Tasks *Responsible: All Staff*

C1. All wastewater from washing activities must be discharged to the sanitary sewer and not to a storm drain or other route to natural waterways or the outdoors, unless the wash water

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discharge has been approved by the Colorado CDPHE / WQCD or is allowed per Denver’s MS4 permit. Talk to a stormwater quality inspector, call DEH, or speak to someone with Denver’s MS4 program.

| <u>D. Emergency Response</u> | <i>Responsible: All Staff</i> |
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| D1. If a spill occurs, refer to Environmental Guideline Spill Response. <ul style="list-style-type: none"> • Call 311 immediately (during normal business hours) or at 303-206-0001 after normal business hours for all spills. | |
| D2. Control spills to minimize property damage and eliminate imminent risk to human health and the environment. | |
| D3. Spills of any kind shall not be washed into any sewer or waterway, or onto any soils. | |
| D4. Containerize all collected wastes and evaluate for labeling, storage and disposal. | |

| <u>E. Inspection & Maintenance Requirements</u> | <i>Responsible: Facility Owners and Maintenance Workers</i> |
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| E1. Pretreatment devices, interceptors, traps, and sumps utilized in the collection of wastewater must be routinely cleaned, inspected, and maintained as needed to function properly and protect the sanitary sewer system. See Environmental Guideline Maintenance of Pretreatment Devices. | |

| <i>Expected Records / Outputs</i> | |
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| <u>Record / Output</u> | <u>Instructions</u> |
| 1. Evidence of training | <ul style="list-style-type: none"> • While formal certifications are not always necessary, some form of “proof of training” (such as sign-in sheets and handouts) is expected and should be maintained on file by the Operations Supervisors or Managers. • DEH sponsored Stormwater Protection training issues an official record of training for all training participants. |
| 2. MSDSs for cleaning solutions/products | <ul style="list-style-type: none"> • Manufacturers of cleaning products will supply these documents on demand. MSDSs for cleaning products should be made available to all employees engaged in cleaning/washing activities and maintained on file by the Operations Supervisor or Manager |
| 3. Analytical laboratory results | <ul style="list-style-type: none"> • For large volumes of process wastewater, testing prior to discharge should be performed by an accredited laboratory. Results should be maintained on file by the Operations Supervisor or Manager for a minimum of 3 years. |

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Expected Records / Outputs

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| 4. Disposal profile, manifests & shipping forms | <ul style="list-style-type: none"> • A disposal profile will be required by the disposal facility prior to shipping. • Manifest forms can be obtained from the disposal facility. • All documents must be maintained on file by Operations Supervisor or Manager for at least three years. |
| 5. Spill Report(s) | <ul style="list-style-type: none"> • If there is a release of contaminants (oil, grease, chemicals) to the environment, a basic report of the spill is required. Other follow-up reports may be required. Copy DEH on all spill reports |

References

Phone Numbers

- **DEQ Emergency Response (during normal business hours) 3-1-1**
- DEQ Emergency Response (after normal business hours)(303) 206-0001

Related Environmental Guidelines (list is not limited to the following)

- Maintenance of Pretreatment Devices
- Spill Response
- Environmental Guideline for General Regulated Waste Management

Applicable Regulations (list is not limited to the following)

- Discharges to the sanitary sewer must comply with Metro Wastewater Reclamation District (MWRD) and Denver Wastewater Management Division Rules and Regulations.
- State CWA Regulations
- 40 CFR 110.3 Discharge of Oil
- 40 CFR 117.3 Determination of Reportable Quantities for a Hazardous Substance
- 40 CFR 122-124 NPDES Regulations for Stormwater Discharges
- 40 CFR 401 Effluent Limitation Guidelines

Other Documents (list is not limited to the following)

- Facility's Municipal Facility Run-off Control Plan
- Denver Municipal Separate Storm Sewer System permit
- Facility Drain and Sewer system as-built Diagrams

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