

Pressure Washing Session Regulatory Overview

MA Marina Industry Compliance
Assistance Workshop
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Pressure Washing Regulatory Framework

- National Pollutant Discharge Elimination System Program (NPDES) under sections of the Clean Water Act – Title 40 CFR Part 122
- Delegation of Authority:
 - Authorized States - CT, ME, RI, VT
 - Non Delegated States - **MA**, NH
- Pressure wash water is a form of process water
- Process water cannot be discharged without an NPDES permit issued by EPA or authorized state

Two Types of NPDES Permits

1) General Permit

- Developed and issued by a permitting authority
- May be written to cover categories of point sources having certain common elements

Considerations for general permits to cover categories of point sources

Examples:

- Storm water point sources
- Facilities involving similar types of operations
- Facilities with same types of waste
- Facilities requiring the same effluent limits or operating conditions
- Facilities having similar monitoring requirements
- Facilities more appropriately regulated by a general permit

NPDES Multi-Sector General Permit for Storm Water

Conditions for marinas:

- Standard Industry Code (SIC)
- Maintenance and repair
- Storm water flows through point source
- Storm water discharges

Best Management Practices must be implemented as part of a Storm Water Pollution Prevention Plan

See EPA New England Fact Sheet for more details:

<http://www.epa.gov/region1/marinas/pdfs/CMEMarineOwnerFactsheet.pdf>

Boat Pressure Washing

General Permit Considerations for Marinas

- Large Number of Facilities to be Covered - Yes
- Facilities Have Similar Production Processes – Yes
- Facilities Generate Similar Pollutants – Yes
- Only a Small Percentage of the Facilities
Have the Potential for Water Quality Standards Violations - No

Two Types of NPDES Permits

2) NPDES Individual Permit

- Specific for an individual facility
- Based on information in the application (e.g., type of activity, nature of discharge, receiving water quality)
- Issued for a specific time period

Developing and Issuing Effluent Limits in an Individual Permit or General Permit– Key Steps

1.) Develop Technology Based Effluent Limits

- Effluent Limit Guidelines (ELGs)
- Best Professional Judgment (BPJ)

2.) Develop Water Quality Based Effluent Limitations (WQBEL's)

3.) Compare (WQBELS's) and Technology Based Effluent Limits and Choose More Stringent of the Two

WQBELS

- Protect the Quality of the Receiving Water
- State Water Quality Standards Must be Met

Provisions:

- 1.) restore/maintain chemical, physical, and biological integrity
- 2.) “fishable/swimmable”
- 3.) consider the use and value

Marina Options for Pressure Washing

- Direct Discharge
- Groundwater Discharge
- POTW Discharge
- Recycling (closed loop) (BMP)
- Holding Tank/ Offsite Disposal (BMP)

Efficiently Controlling Pressure Wash Water - Keys for Marinas

- Collection of information and trends; dissemination of information to marinas
- Environmental Planning

EPA Environmental Management Plan Workbook:

<http://www.epa.gov/region1/marinas/pdfs/MarinaEMPJuly05.pdf>

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✓ Massachusetts Clean Marina Guide:

<http://www.mass.gov/czm/marinas/guide/macleanmarinaguide.htm>

✓ New England Regional Marina Website:

<http://www.epa.gov/region1/marinas/index.html>EPA

✓ EPA Environmental Management Plan Workbook:

<http://www.epa.gov/region1/marinas/pdfs/MarinaEMPJuly05.pdf>