City of Los Angeles Industrial Waste Management Division 2714 Media Center Drive Los Angeles, CA 90065

> Mr. Mobile Washer 1234 Clean Sweep Lane Scrubbington CA 90000







The Industrial Waste Management Division of the City of Los Angeles has prepared this information sheet to assist mobile washer operators and property owners in understanding their responsibilities regarding the management of industrial wastewater generated from mobile washer activities. The discharge of wash water to the storm drain collection system is not an acceptable practice and it is the intent of the City to secure full compliance through the permitting of mobile washers and the adoption of Best Management Practices (BMPs).

City of Los Angeles Sewer and Storm Drain Collection Systems

The City's sewer and storm drain systems are distinct and independent of each other. The sewer system conveys residential (i.e., household) and pretreated industrial wastewater to four treatment plants owned and operated by the City. More than 400 million gallons per day of this collected wastewater undergoes extensive physical, chemical, and biological treatment, producing clean water that is safe for ocean discharge or for reuse as in landscape irrigation.

The City's storm drain system conveys urban and storm water runoff directly to the ocean. The storm drain system is not meant to collect any residential or industrial wastewater at any time. Use of the storm drain system to discharge residential or industrial wastewater is a violation of City

Ordinance.

Mobile Washer Operator and Facility Owner Responsibilities

Federal, State, and local regulations make it unlawful to release non-storm water discharges to the storm drain system. Wash water originating from mobile washer activity is classified as industrial wastewater and must never be allowed to enter the storm drain. The wash water often carries with it pollutants such as suspended solids, oil and grease, heavy metals, hydrocarbons, and other organic matter. The person who generates and releases such discharge may be held responsible for failing to observe these regulations. This person would therefore be the mobile washer owner and/or operator.

Local building codes may also hold the facility owner responsible for failing to protect their connection to the storm drain system. Fines may be

imposed and the storm drain connection may be removed from service. Thus, facility owners should ensure that they only contract with reputable mobile washers who demonstrate full knowledge of their responsibilities and compliance with the law.

What are some of the industries serviced by mobile washers?

♦ Transportation Industry

Fleet maintenance and engine/equipment degreasing Cargo container cleaning and graffiti removal Gasoline and diesel fuel dispensing areas Roadways and parking areas

Commercial Facilities

Production lines, machines, and heavy equipment Loading docks, sidewalks, and parking areas Building exteriors and windows Paint stripping and graffiti removal

♦ Hotels and Food Service Industry Food preparation equipment Kitchen area vents and hoods Dumpster and trash storage areas Carpets, rugs, and draperies Sidewalks and parking areas Building exteriors and windows

Residential and Government Carpets, rugs, and drapery Sidewalks, driveways, and parking areas Building exteriors and windows



Does a mobile washer need to obtain an Industrial Wastewater Permit?

An Industrial Wastewater Permit must be obtained prior to the discharge of industrial wastewater to the sewer collection system. A mobile washer may be exempt from this permit requirement if their total discharge to sewer is less than 200 gallons per day and pretreatment of the discharge is not required. All mobile washers, regardless of their permit status, must comply with best management practices, sewer prohibitions and restrictions, and local limits.

The City of Los Angeles, Bureau of Sanitation, Industrial Waste Management Division will make the final determination whether or not a mobile washer will need to obtain an Industrial Wastewater Permit. When the Industrial Wastewater Permit is issued. the mobile washer will be faced with additional permit requirements such as sampling and reporting.

How is industrial wastewater generated from a mobile washer cleaning operation?

Industrial wastewater is generated when potable water comes into contact with cleaning chemicals and compounds used to remove undesirable material from a surface. What are some examples of chemicals, compounds, and substances contained in industrial wastewater as a result of cleaning operations?

- Caustic (high pH) or acidic (low pH) water-based cleaning compounds.
- gasoline, antifreeze, brake fluid, and transmission fluid) and heavy metals such as zinc, copper, and lead.

- Toxic organic compounds contained in cleaning solvents and paint strippers.
- ♦ Toxic substances such as automotive fluids (e.g., motor oil,
- Biodegradable wastes such as oil and grease, yard clippings, and discarded food.



Prohibitions and Restrictions

The following prohibitions and restrictions apply to discharges of industrial wastewater to sewer that may result from mobile cleaning activities:

- Never discharge any wastewater that contains a pollutant that may create a fire or explosion hazard in the sewer system.
- Never discharge any wastewater that is corrosive as indicated by a pH value of less than five and a half (5.5).
- Never discharge any wastewater that contains solid or viscous pollutants in sufficient amounts that will cause obstruction
- Never discharge wastewater containing petroleum oil, non-biodegradable cutting oil, or other products of mineral oil origin.
- Never discharge industrial wastewater generated from the following or similar cleaning operations, including but not limited to:
 - a) Fuel or chemical storage tanks and trailer truck interiors.
 - b) Building interiors or structures in areas where federally regulated operations are conducted, or where equipment is used for federally regulated industrial operations.
 - c) Areas contaminated with gasoline or similar materials which may result in explosive conditions.
 - d) Wastewater generated as part of an emergency response or cleanup.

These wastes require extensive pretreatment prior to discharge to the sewer.

Best Management Practices

The practices presented below are intended to help the mobile washer prevent the entry of industrial wastewater into the storm drain system and thus maintain compliance with storm drain discharge regulations. These practices are also intended to ensure that the resulting industrial wastewater meets the standards for sewer discharge.

The following best management practices must be observed by all mobile washers (i.e., both permitted and exempt) regardless of the surface to be cleaned and the type of cleaning operation to be performed:

- Walk the area to be cleaned prior to the start of the job and identify all area drains, yard drains, emergency drains, drainage channels, and sumps where wastewater could be released to the storm drain system.
- Block or seal off all identified release points using sand bags, plugs, rubber mats, vacuum booms, containment pads, or temporary berms.
- Sweep all surfaces prior to washing so as to minimize the amount of "soil" and grit contained in the resulting industrial wastewater.
 - a) Collect all trash, litter, and debris from the area and place in a proper trash bin or waste receptacle for disposal.
 - b) Use absorbents such as mats or pads, rice hull ash, cat litter, vermiculite, or sand to soak up spilled liquids.
 - c) Sweep, vacuum, shovel, and/or wipe up these saturated absorbents and dispose of properly. Absorbents used to clean up spilled automotive fluids may require disposal as hazardous waste.
- Screen all chemicals and compounds used for cleaning and eliminate the use of those that contain toxic organic compounds, heavy metals, high levels of phosphates, or very high/very low pH.
- Conduct mobile washing in accordance with all operating instructions provided by the equipment supplier. Maintain equipment in good working order and routinely check and test all safety features.
- Collect the industrial wastewater for discharge to the sewer system. A simple and acceptable collection method only requires a drain plug to prevent release to storm drain, a small sump pump, and a hose fitted with a filter sock to prevent the discharge of suspended solids. Sewer access, in order of preference, includes:
 - a) Use of a permitted sand trap, clarifier, sink, or clean-out stub at the facility where the cleaning operation occurs.
 - b) Off-site transport of the wastewater to the mobile washers' facility for sewer discharge via a permitted connection.
 - c) Off-site transport of the wastewater to a third-party facility such as a car wash or other mobile washer for sewer discharae via a permitted connection.

Additional Requirements The mobile washer must also follow these additional industrial wastewater

Follow all procedures for Standard Local Industrial Users (LIU).

permit requirements:

- Monitor the pH of the wastewater prior to discharge. This can be quickly and easily done through the use of pH paper test strips.
- Ensure that the wastewater temperature is less than 140°F prior to sewer discharge.
- Filter the wastewater if it contains a large amount of suspended solids that could cause sewer blockage.
- Maintain a logbook of all discharges.

List of Contacts

For additional information regarding industrial wastewater discharges to the sewer collection system, please contact:

City of Los Angeles **Department of Public Works Bureau of Sanitation** Industrial Waste Management Division 2714 Media Center Drive Los Angeles, CA 90065 (323) 342-6200 (323) 342-6111 FAX www.lacitysan.org

Information regarding hazardous materials and hazardous wastes in reference to usage, storage, accidental release, and fire code plans inventory requirements, may be obtained by contacting:

City of Los Angeles Fire Department **Industrial and Commercial Section** (213) 485-8080

> For more information regarding issues associated with occupational and worker health and safety, please contact:

REMEMBER:

NEVER discharge industrial wastewater into the storm drain system!

Cal-OSHA **Consultation Service** (800) 963-9424