motor vehicle waste fluid disposal
Jennifer Parker to: Nick Gobin 10/13/2011 04:44 PM

From: Jennifer Parker/R10/USEPA/US
To: Nick Gobin <nickgobin@tulaliptribes-nsn.gov>,

In response to your question about whether a motor vehicle maintenance and repair facility can discharge fluids collected through floor drains in a vehicle maintenance area to the MBR treatment system, I offer the following response from the UIC program:

The motor vehicle facility proposes to use an oil/water separator to pre-treat the waste before sending it to your MBR system. Oil/water separators typically do not remove gasoline range hydrocarbons or metals from motor vehicle maintenance waste streams and are not considered to be appropriate pre-treatment unless the treatment system is designed to remove these compounds. MBR systems typically are not intended to remove gasoline range hydrocarbons or metals from wastewater and if they are not removed from the effluent prior to disposal in injection wells, you may inadvertently create up to 19 motor vehicle waste disposal wells, which would be out of compliance with the Safe Drinking Water Act and could endanger the Tulalip Tribes' drinking water resources. In addition, gasoline range hydrocarbons and metals could damage the treatment system which may lead to decreased treatment of other constituents and other problems.

In response to other entities that have have asked about treating and injecting wastewater from industrial sources, the UIC program has offered the following standard response:

> You will be responsible for maintaining records of written manifests documenting the nature and composition of all wastes received for disposal, including statements documenting that the waste is exempt from regulation as hazardous waste under 40 C.F.R. § 261.4.

You would be responsible to ensure that the appropriate testing is conducted prior to receiving the waste fluid from the facility.

In addition, if motor vehicle waste is likely to enter the treatment system, the MBR system effluent monitoring plan would need to be reviewed to determine whether you would need to increase the frequency of testing for volatile organic compounds, metals, and other parameters.

The motor vehicle facility may have some other options available, such as running a dry shop, connecting a holding tank to the floor drains, or other options not mentioned here. If a holding tank is proposed the fire marshal and all other appropriate regulatory authorities should be consulted to ensure that the design is appropriate and the fluid would need to be managed appropriately (typically it needs to be characterized to determine whether it is hazardous before deciding where it can be disposed).

Please feel free to contact me if you have any questions or wish to discuss this further.

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