

PRETREATMENT CORNER

Miscellaneous Sources of Industrial Wastewater

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The Pennsylvania Clean Streams Law of 1937 defines Industrial Waste as “...any liquid, gaseous, radioactive, solid or other substance, not sewage, resulting from any manufacturing or industry, or from any establishment as herein defined...” Section 307 of the Clean Streams Law further references Industrial Waste Discharges and states that “...no person or municipality shall discharge or permit the discharge of industrial wastes in any manner, directly or indirectly, into any of the waters of the Commonwealth unless such discharge is authorized by the rules and regulations of the Department or such person or municipality has first obtained a permit from the Department...”

With the onset of stormwater management regulations, DEP has been trying to play catch up, and has been identifying commercial establishments that have been discharging, either to on-lot disposal systems or to storm sewers, industrial wastewater, so classified since chemicals have been added to the wastestream. As a result, DEP has been directing the commercial establishments to either, apply for an NPDES permit for a direct discharge, which will then have discharge standards, or, to seek approval from the local POTW for discharge to the municipal sewer system.

One such case involves a small car wash owner in a rural area of Pennsylvania that discharged the runoff from the car wash to an on-lot disposal system. Since the Clean Streams Law specifically identifies industrial waste as DEP’s permitting responsibility, a municipal Sewage Enforcement Officer (SEO) is not authorized by the Sewage Facilities Act to issue a permit for industrial discharges to on-lot disposal systems. DEP later issued guidance, which allowed permitting of groundwater discharges from car washes and laundries, with appropriate treatment and operational controls. DEP determined that inadequate treatment of solvents and other chemicals was occurring with car wash wastes and decided not to allow subsurface disposal any longer for these types of wastes. At DEP’s recommendation, the car wash owner contacted the local POTW for permission to discharge to the municipal sewer system.

A second case involves a gas station/convenience store lot, which was told by DEP that it was no longer permitted to discharge the wash water from its lot washing operations to the storm sewer system, since chemical additives (i.e., concrete cleaners) are used when the store lot is power washed. As a result, the store owner requested permission from the local POTW to discharge this wash water to the municipal sewer system after proper treatment.

While these types of non-categorical discharges would probably have little or no impact on larger wastewater treatment facilities, the same discharge may cause inhibition at a small treatment facility or may be detrimental to the wastewater collection system due to the nature of the discharges. Think about it, what happens when an overzealous customer is pumping gas and overflows his gas tank. Where does the gas go? Many of these same facilities also have food preparation onsite. Does the facility have a grease interceptor (whole other subject)? Several hundred gallons of wash water should not be discharged directly to the grease interceptor—they work so well as it is.

So while these low-flow discharges may appear to be fairly innocuous, be wary and be thorough in the investigation. Ask for the MSDSs of any chemicals or detergents that are proposed for use. Find out if any treatment is proposed prior to discharge. At the very least check the field pH of the discharge and observe any unusual odors. And be careful out there – especially since you probably buy your morning coffee at the same place!