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NADA MANAGEMENT SERIES

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A Dealer Guide to

WATER AND WASTEWATER MANAGEMENT

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A Dealer Guide to WATER AND WASTEWATER MANAGEMENT

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A Dealer Guide to WATER AND WASTEWATER MANAGEMENT

I. Preface

This Guide is intended to provide general compliance guidance concerning water and wastewater management issues that may arise at automobile and truck dealerships. It is not legal advice and is not a substitute for facility-specific review of applicable federal, state, tribal, and local requirements. Because dealership operations, plumbing configurations, and site conditions vary, each dealership should confirm where its drains and wastewater systems lead and should review applicable sewer-use, pretreatment, stormwater, underground injection control, and waste management requirements before relying on any general practice described in this Guide.

This Guide addresses common dealership activities involving wastewater generation, discharge, handling, and conservation, including floor drains, vehicle washing, sanitary wastewater, stormwater runoff, oil-water separators, coolant management, and water-efficiency practices. In many cases, compliance can be improved through sound housekeeping, employee training, proper system maintenance, and careful review of local requirements. However, no dealership should assume that a particular discharge or disposal practice is permissible without first confirming that it is authorized at the facility and under applicable law.

Automobile and truck dealerships vary in size, geographic location, and business operations. Therefore, some sections of this Guide may not apply to every dealership facility.

This Guide outlines minimum federal requirements and compliance strategies geared toward those requirements. Some state and local jurisdictions have requirements that are more stringent than federal law.

In addition to information designed to assist dealerships with their wastewater compliance responsibilities, this Guide also aims to assist dealerships with reducing water consumption. Reducing dealership water usage can result in significant annual cost savings, especially where water costs or consumption rates are relatively high.

II. Overview of Regulated Dealership Wastewater Concerns

Wastewater and stormwater generated at automobile and truck dealerships are regulated by federal, state, and local requirements. The applicable rules generally depend on the type of wastewater or runoff involved, how it is generated, where it is discharged, and what management systems are used at the facility.

This Guide therefore begins with an overview of the principal wastewater management options that may apply to dealerships, including discharges to municipal systems, sanitary wastewater systems, oil-water separators and other pretreatment devices, underground injection control issues, and the main wastewater and stormwater concerns commonly encountered at dealerships.

The Guide next addresses common dealership activities that generate pollutants or wastewater requiring management, including shop floor drains, vehicle wash bays, stormwater runoff, and municipal separate storm sewer systems. Next, the Guide provides practical recommendations for dealerships that discharge to a Publicly Owned Treatment Works (POTW), conduct vehicle washing, clean service bays, manage sanitary wastewater, handle spent radiator coolants, and manage stormwater runoff.

The Guide concludes with water-conservation practices and additional compliance resources.

III. Overview of Wastewater Management Options

Once a dealership has identified the wastewater and stormwater sources present at the facility, the next step is to understand the management systems and discharge pathways that may apply to manage those sources. Depending on site conditions and local infrastructure, dealership wastewater may be discharged to a POTW, managed through sanitary wastewater systems, routed through oil-water separators or other pretreatment devices, or, in some cases, disposed to underground injection control systems. The sections below provide an overview of these management options and the key compliance considerations associated with each.

A. POTWs and Pretreatment Programs

POTWs are municipal wastewater treatment systems that receive sanitary sewage and, in many cases, approved commercial or industrial wastewater through a collection system. POTWs are designed primarily to treat domestic sewage, and pretreatment requirements exist to prevent pollutants from causing pass through, interference with treatment operations, or contamination of sewage sludge. Dealerships that discharge nondomestic wastewater to a POTW are therefore subject to general sewer-use ordinances, applicable federal pretreatment standards, and any state, local, or POTW-specific requirements.

Under the Clean Water Act, direct discharges of pollutants to waters of the United States generally require authorization under the [National Pollutant Discharge Elimination System \(NPDES\)](#). For that reason, dealerships should not discharge wastewater directly to surface waters unless the discharge is lawful and all necessary approvals and permits have been obtained.

Dealerships that send floor-drain wastewater, wash-bay wastewater, oil-water separator effluent, or other nondomestic wastewater to a POTW should review applicable sewer-use ordinances, discharge permits, written

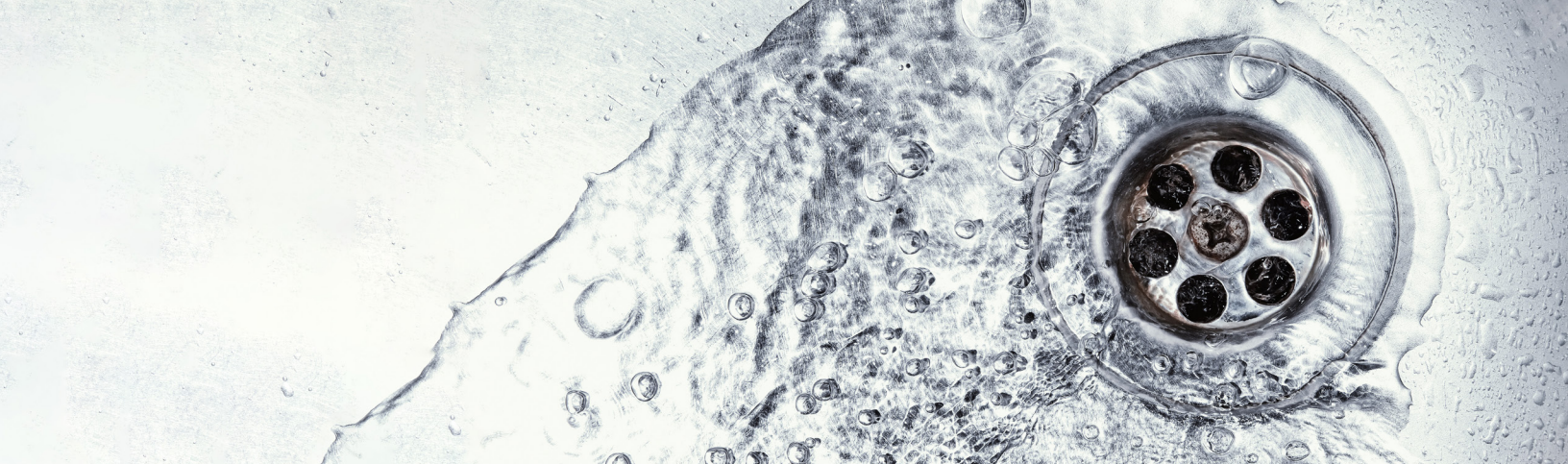
authorizations, and local pretreatment requirements before discharging wastes. Many POTWs impose specific local limits, best management practices, operating conditions, sampling requirements, notification obligations, or prohibitions on particular wastes, and those local requirements may be more strict than the general federal standards. POTWs with approved pretreatment programs are required to develop and enforce specific local limits as necessary to implement the federal prohibitions.

Dealerships should understand that the federal pretreatment regulations prohibit, among other things:

- Pollutants creating fire or explosion hazard in a collection system or POTW.
- Corrosive discharges, including pH lower than 5.0, unless the POTW is specifically designed to accommodate them.
- Solid or viscous pollutants that obstruct flow.
- Pollutant loadings sufficient to interfere with POTW operations.
- Heat in amounts that inhibit biological activity and, in no case, heat causing the temperature at the POTW treatment plant to exceed 104 °F (40 °C) unless an alternate limit has been approved.
- Petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin in amounts causing interference or pass through.
- Pollutants resulting in toxic gases, vapors, or fumes that may cause acute worker health and safety problems.
- Trucked or hauled pollutants except if and where designated as a discharge point by the POTW.

Because local requirements may vary, dealerships should:

- Maintain an understanding of wastewater streams sent to the sanitary sewer.
- Determine requisite pretreatment equipment or practices before discharge.
- Keep current records of permits, approvals, inspections, and related compliance requirements.



B. Sanitary Wastes

Sanitary or domestic wastewater typically arises from restrooms, washbasins, sinks, showers, kitchens, and water fountains. A dealership connected to a POTW should discharge sanitary wastewater generally through the sanitary sewer system in accordance with local requirements. Where a municipal connection is not available, sanitary wastewater may be managed through a septic system or authorized domestic wastewater treatment system, subject to applicable requirements.

Because septic systems and similar on-site wastewater systems are designed for domestic sewage, they should not receive floor-drain wastewater, vehicle wash water, oily wastewater, spent radiator coolant, cleaning fluids, or other non-domestic waste streams unless a regulatory authority has expressly authorized it. Older facilities should pay attention to undocumented or historical plumbing connections that may direct service-bay or wash-water discharges into septic or other subsurface systems that may not be legally compliant anymore.

Improper use of a septic system can create regulatory, environmental, and property-related risks, including on-site contamination and reduced property value. Contaminating neighboring property may expose the dealership to off-site remediation responsibilities or other legal obligations. Dealerships using septic or other on-site systems should verify what drains into the system, inspect and maintain the system regularly, and pump, clean, or repair it as needed to maintain proper operation. Slow drainage, backups, surfacing wastewater, or other signs of poor performance should be addressed promptly.

Best Management Practices and Recommendations:

- Determine where sink, kitchen, water fountain, and washbasin drains flow.
- Avoid pouring non-sanitary wastes into those drains.
- Regularly maintain septic or other on-site systems for proper operation.
- Investigate older or undocumented plumbing connections before assuming a drain handles only sanitary wastewater.

C. Oil-Water Separators and Other Pretreatment Options

Oil-Water Separators (OWS), oil/grit separators, sand traps, and similar devices may be used to remove oil, grit, sediment, and related materials from wastewater before it is discharged to a POTW or otherwise managed through an authorized system. These devices can play an important role in wastewater management, but they must be inspected, cleaned, and maintained regularly to function properly. If solids, oil, sludge, or other residues accumulate excessively, separator performance may decline and contaminants may be carried into downstream systems.

Material removed from an oil-water separator may include water, floating oil, sludge, grit, sediment, and other residues. Because the composition of that material depends on what has entered the drains leading to the separator, dealerships should not assume that separator sludge or pump-out residuals are nonhazardous based solely on appearance or general rules of thumb. The better approach is to keep non-

authorized wastes out of the system in the first place and to evaluate separator residuals based on the actual wastes managed at the facility and any applicable regulatory requirements.

If separator residuals, recovered oil, or oily wastewater will be reused or recycled, the dealership should coordinate with the recycler or transporter to confirm what materials the recycler may lawfully accept, what testing or profile information is required, and whether the material will be managed as used oil, wastewater, sludge, hazardous waste, or another regulated waste stream. If wastewater or separator discharge is directed to a POTW or other wastewater treatment system, the dealership should also confirm that the discharge is authorized under the applicable sewer-use ordinance, industrial pretreatment requirements, permit conditions, and state or local restrictions. Oil-contaminated wastewater may be subject to additional limitations, and wastewater that also contains solvents, fuels, metals, antifreeze, cleaning chemicals, or other hazardous constituents should not be discharged to a POTW unless the discharge has been specifically evaluated and authorized.

To reduce compliance risk, dealerships should avoid allowing hazardous wastes, chemical wastes, solvents, fuels, coolants, or other inappropriate materials to enter drains that lead to an oil-water separator or similar pretreatment unit. Employees should be trained on what may and may not be discharged into those systems, and the dealership should maintain clear written procedures for separator use, inspection, and maintenance. Good housekeeping and waste segregation practices are essential to preserving the effectiveness of the separator and reducing the likelihood that resulting sludge or residuals will require more burdensome handling.

Requirements governing pump-out, testing, transport, and off-site management of separator sludge and residuals may vary by jurisdiction. Dealerships should determine what requirements apply before arranging removal. Where testing, waste profiling, or other characterization is required or appropriate, it should be completed before off-site shipment. If separator residuals must be managed as hazardous or otherwise

specially regulated waste, the dealership should ensure that the selected hauler and receiving facility are qualified and authorized to handle that material.

Recommended practices include:

- Keep unauthorized wastes out of drains leading to the separator.
- Inspect separators regularly and clean them out before excessive accumulation occurs.
- Determine whether testing or waste characterization is required before off-site shipment.
- Use qualified haulers and receiving facilities.
- Retain manifests, pump-out records, and disposal confirmations.
- Manage separator sludge and related residuals carefully; improper off-site handling can create significant liability for the generator.

D. Underground Injection and Class V Motor Vehicle Disposal Wells

Dealerships should determine whether any drains, sinks, septic systems, dry wells, drain tanks, cesspools, catch basins, or similar subsurface systems receive or once received fluids from vehicle repair, maintenance, or washing activities. Such systems may present significant regulatory and environmental risk because they can affect underground sources of drinking water. EPA identifies floor drains and similar systems tied to shallow disposal structures as potential waste disposal wells under the [Underground Injection Control \(UIC\)](#) program.

Under the federal UIC program, certain subsurface systems that receive fluids from motor vehicle repair or maintenance activities may qualify as Class V motor vehicle waste disposal wells. These systems are commonly associated with service-area floor drains or sinks, but they may also include shallow septic systems, dry wells, drain tanks, cesspools, catch basins, sinkholes, underground vaults, and similar structures if they receive motor vehicle waste fluids. [EPA states](#) that new motor vehicle waste disposal wells have been banned nationwide

since April 5, 2000. The federal deadline for closure of all motor vehicle waste disposal wells not already permitted as part of the EPA's UIC program was January 1, 2007.

Because the presence of a current or legacy motor vehicle waste disposal well can create substantial compliance and property-related issues, dealerships should identify any such systems and determine:

- Whether they remain in use.
- What waste streams they receive or previously received.
- Whether they were properly closed or abandoned.

Particular attention should be given to older facilities where historical plumbing configurations may be poorly documented or where service-bay drains may once have been connected to shallow subsurface disposal systems.

Recommended practices include:

- Investigate historical floor drains, sinks, dry wells, septic systems, and similar structures before assuming they are compliant.
- Avoid routing service-bay wastewater, vehicle-maintenance fluids, or similar wastes to a subsurface disposal system unless expressly authorized by your POTW.
- Retain any available records concerning the location, design, operation, closure, or remediation of such systems.
- Address questions regarding historical drains or underground structures promptly rather than assuming the system is compliant.

If a dealership identifies an actual or potential motor vehicle waste disposal well, it should confirm the applicable requirements with the responsible state or federal UIC authority before taking further action. EPA's current guidance emphasizes that closure, continued operation, and related obligations may vary by jurisdiction and site-specific conditions.¹

IV. Specific Dealership Activities Requiring Management

After identifying the available wastewater management pathways, the next step is to consider the dealership activities that commonly generate pollutants, wastewater, or runoff requiring control. At most dealerships, the principal sources are shop floor drains, vehicle wash bays, and stormwater runoff. The sections below describe these activities and explain why they require careful management to prevent unauthorized discharges, contamination, and related compliance risks.

A. Shop Floor Drains

Floor drains in service areas typically collect water used for routine floor cleaning, rainwater, snow, and ice melt tracked in by vehicles. Older facilities may have undocumented plumbing configurations or legacy disposal systems, so dealers should determine and document where floor drains lead. No dealership should assume that a floor drain is connected to a sanitary sewer, oil-water separator, holding tank, septic system, dry well, or other approved discharge point without confirmation through drawings, inspection, dye testing, or other means.

In general, shop floor drains should not discharge to ponds, creeks, streams, storm drains, septic systems, wells, or other surface-water or subsurface disposal pathways unless the dealership confirms that discharge is lawful and all required approvals are obtained. Unpermitted discharges can create regulatory and property-related risk and pollute the environment at or near the dealership.

Where floor-drain wastewater is discharged to a POTW, the dealership should confirm that the discharge is authorized under applicable sewer-use and pretreatment requirements. In some cases, floor-drain wastewater may pass through on-site pretreatment equipment, such as an oil-water separator or clarifier, before entering the sanitary sewer. Where a dealership is not connected to a POTW, floor-drain wastewater may need to be collected in a holding tank and removed periodically by a qualified contractor for lawful transport and disposal.

Although small drips or incidental spills may enter a floor drain during normal repair and maintenance activities, waste fluids (such as used oil, transmission fluid, brake fluid, power steering fluid, antifreeze, solvents, parts-cleaning fluids, fuels, and similar wastes) should never be intentionally poured, washed, or otherwise discharged into a service-area floor drain unless the receiving system is specifically designed and authorized to accept those materials. The bottom line is that floor drains should not be treated as a disposal outlet for vehicle-related wastes.

Where practicable, dealerships should consider operating a “dry shop,” meaning a service area designed to minimize or eliminate routine floor-drain discharges.

A dry-shop approach may not be feasible in all climates or facility configurations, but the following practices are recommended in all cases to reduce wastewater volume and pollutant discharge:

- Sweep shop floors regularly to prevent dirt, grit, and contaminants from accumulating.
- Use dry-cleaning methods, damp mops, absorbents, or similar low-water practices wherever feasible.
- Clean up leaks and spills immediately using appropriate absorbents or other cleanup materials, and dispose of those materials properly.
- Minimize hosing or wash-down of service areas to avoid generating large volumes of contaminated washwater.
- Consider sealing shop floors with impervious materials, such as epoxy or similar coatings, to facilitate cleanup.
- When pressure washers or floor machines are used, ensure that all washwater is collected and managed through an authorized system. The dealership remains responsible for lawful management of the washwater even if the work is performed by a contractor.

Where a dry-shop approach is not feasible, floor-drain wastewater should be routed only to an authorized discharge system, such as an approved sanitary sewer connection or a properly



managed holding tank for off-site removal. In all cases, the dealership should maintain a clear understanding of where floor-drain wastewater flows, what the receiving system is authorized to accept, and what local operating, pretreatment, inspection, or recordkeeping requirements apply.

B. Vehicle Wash Bays

Dealerships often use dedicated bays or designated areas to wash vehicles, and the compliance concerns associated with those operations depend largely on what is being washed, what cleaning products are being used, and where the resulting wastewater is discharged. As a threshold matter, dealerships should determine where wash-bay wastewater goes and confirm whether a particular discharge method is lawful.

Where no engine, undercarriage, or similarly heavy cleaning is performed, wash-bay wastewater may present fewer contamination concerns, but it may still contain detergents, sediment, oil, grease, metals, and other pollutants. For that reason, wash-bay wastewater should not be discharged to storm drains, surface waters, septic systems, dry wells, or other subsurface disposal systems unless the dealership has confirmed that the discharge is lawful and all required approvals have been obtained.² Guidance for vehicle maintenance and washing continues to emphasize keeping contaminated washwater out of storm drains and surface waters.

Where vehicle wash-bay wastewater is discharged to a POTW, the dealership should confirm that the discharge is authorized under applicable sewer-use and pretreatment requirements and that any required pretreatment equipment is properly operated and maintained. Where feasible, dealerships should consider using biodegradable or otherwise treatment-compatible cleaning products and should evaluate whether a wash-water recycling system is appropriate based on local requirements, water availability, and operating costs.

Dealerships should maintain a clear understanding of:

- Where wash-bay wastewater goes.
- What the receiving system is authorized to accept.
- Whether any local permit, authorization, pretreatment, inspection, or recordkeeping requirements apply.

C. Stormwater Runoff

Stormwater runoff generally consists of rainwater or snowmelt flowing over dealership property, including paved surfaces, rooftops, parking areas, and landscaped areas. As stormwater moves across the site, it may pick up oil, fuel, solvents, sediment, fertilizers, pesticides, trash, and other pollutants that can be carried to storm drains, surface waters, or groundwater. Dealerships should therefore evaluate how stormwater moves across the property and identify any areas where dealership operations, storage, or maintenance activities could contribute pollutants to runoff.

Federal regulations require stormwater discharges associated with specific categories of industrial activity to be covered by NPDES permits. These permits limit the release of pollutants discharged from a point source directly into surface waters of the United States. Dealerships should not assume that no stormwater permits or requirements apply simply because they operate as automobile or truck dealerships. Stormwater obligations may depend on actual site activities, exposure conditions, discharge pathways, and applicable federal, state, and local requirements. The U.S. Environmental

Protection Agency (EPA) regulates stormwater discharges associated with industrial activity, and states or localities may impose broader or additional requirements. In some areas, there are new programs being developed to require permits based not on industrial activity, but on the amount of impervious surface at the site.³

Even when a permit is not required, dealerships should implement reasonable measures to prevent stormwater contamination associated with the activities and processes at the dealership. EPA's Best Management Practices (BMP) guidance for vehicle maintenance and washing areas emphasizes keeping contaminated runoff and washwater out of storm drains and surface waters.

Recommended Best Management Practices include:

- Ensure that outside vehicle storage areas and other paved surfaces direct stormwater to authorized collection or drainage systems.
- Consider using fabric filter logs at storm drain inlets to reduce sediment and other pollutants from entering the storm sewer system, and regularly maintain or replace such devices.
- Regularly inspect tanks, pipes, pumps, catch basins, drums, and other potential sources of leaks or spills.
- Implement spill and leak containment and cleanup procedures promptly if releases occur.
- Pay attention to vegetation discoloration or loss, odors, stained pavement, and other signs of contamination.
- Sweep paved surfaces regularly to remove dust, debris, grit, and sand.
- Avoid washing out service bays or allowing service-bay wastewater to migrate onto outside paved areas or into storm drains.
- Confirm local drainage-control, detention, fee, or maintenance requirements that may apply even if a contamination-based permit is not required.



D. Municipal Separate Storm Sewer Systems (MS4s)

Stormwater discharged from dealership property into the street may enter a municipal separate storm sewer system (MS4). An MS4 is a publicly owned or operated stormwater collection system, such as streets with drainage systems, curbs, gutters, ditches, catch basins, storm drains, or similar conveyances, designed to collect and convey stormwater.

MS4-related requirements often focus on minimizing pollutants in stormwater runoff to the maximum extent practicable and may address issues such as illicit discharges, non-stormwater connections, housekeeping, spill prevention, site drainage, and stormwater management practices. Even where a dealership does not hold its own industrial stormwater permit, it may still need to comply with MS4 requirements governing runoff that enters the local storm sewer system.

Dealerships located within municipal boundaries should determine:

- Whether a municipality or other MS4 operator has ordinances, permit conditions, or stormwater quality requirements that apply to dealerships.
- Whether the site has any non-stormwater discharges, cross-connections, or drainage features that could violate local MS4 requirements.
- Whether additional housekeeping, spill-control, drainage, or stormwater-treatment measures are needed to reduce pollutant discharges to the municipal storm sewer system.

Recommended practices include:

- Identifying all storm drains, catch basins, drainage swales, and other conveyances that receive runoff from the dealership.
- Preventing service-bay wastewater, washwater, coolant, oil, detergents, or other non-stormwater discharges from entering the storm sewer system.
- Maintaining good housekeeping and spill-prevention measures in outdoor areas.
- Inspecting paved areas, drainage inlets, and outdoor material-storage areas regularly.
- Confirming whether the municipality requires stormwater management plans, BMP implementation, employee training, or other site-specific controls.

V. Recommendations Related to Specific Dealership Activities

Once a dealership understands its wastewater sources and the management systems, the next step is to apply that information to specific dealership operations. The sections below provide practical recommendations for common situations, including discharging wastewater to a POTW, conducting vehicle washing, cleaning service bays, managing sanitary wastewater, and handling spent radiator coolants. These recommendations are intended to help dealerships translate the broader management concepts discussed above into day-to-day compliance practices.

A. Discharge to a POTW

To help ensure that wastewater discharged to a POTW complies with applicable requirements,

dealerships connected to a municipal sanitary sewer should, at a minimum, identify where each drain and collection point leads, determine which wastewater streams are being sent to the sanitary sewer, and confirm that those discharges are authorized under applicable sewer-use and pretreatment requirements. Dealerships should review applicable local rules and any permit, written authorization, or discharge conditions that may apply before discharging non-domestic wastewater to a POTW.

Dealerships connected to a POTW should also obtain and comply with applicable local pretreatment requirements, including any requirements relating to oil-water separators, oil/grit separators, sand traps, sampling, inspection, maintenance, recordkeeping, or prohibitions on specific waste streams. Wastewater from service areas, wash bays, separators, or other dealership operations should never be discharged to a storm sewer or other unauthorized drainage system.

Dealerships not connected to a municipal sanitary sewer should determine where each floor drain, wash-bay drain, sink, or other wastewater collection point leads and confirm that each discharge pathway is lawful and authorized. Dealerships should avoid discharging wastewater to storm sewers, septic systems, leach fields, cesspools, dry wells, or other subsurface systems unless authorized or approved.⁴ Where on-site disposal is not authorized, wastewater should be collected through an appropriate holding or management system and removed by a qualified contractor for lawful recycling, transport, treatment, or disposal.

Dealerships connected to municipal sanitary sewers should:

- Determine where each dealership drain flows.
- Comply with federal, state, local, and POTW pretreatment requirements.
- Obtain any required POTW permit, written authorization, or other approval for nondomestic wastewater discharges.
- Comply with local requirements for oil-water separators, oil/grit separators, sand traps, sampling, inspection, maintenance, and recordkeeping.

- Never discharge dealership wastewater to storm sewer drains.

Dealerships not connected to municipal sanitary sewers should:

- Determine where each floor drain, wash-bay drain, sink, and similar collection point flows.
- Avoid discharging dealership wastewater into storm sewers.
- Avoid discharging wastewater into septic systems, leach fields, cesspools, or dry wells unless expressly permitted by the responsible authority.
- Collect wastewater in holding tanks or other authorized systems and use a qualified contractor for lawful recycling, transport, treatment, or disposal.

Contaminated Wastewater

Dealership wastewater should be kept as clean and segregated as possible. Wastewater may become more difficult and expensive to manage if contaminated by hazardous substances, incompatible wastes, excessive recycling residues, or improper disposal practices. Good housekeeping, prompt spill cleanup, proper waste segregation, and clear employee instructions are important to avoid turning an otherwise manageable wastewater stream into a more heavily regulated waste.

If there is reason to believe that wastewater has become contaminated with hazardous constituents, the dealership should make an appropriate determination regarding how the material must be managed and use a qualified contractor to ensure lawful transport, recycling, treatment, or disposal.

Recommended practices for potentially contaminated wastewater:

- Avoid mixing hazardous or incompatible wastes into wastewater.
- Investigate and document the nature of the contamination before disposal.
- Do not self-dispose of potentially hazardous wastewater through drains, pits, dry wells, or similar systems.

- Recycle as many waste fluids (oil, antifreeze, etc.) as possible.
- Use qualified contractors and retain records on how material was managed.

B. Vehicle Washing

Vehicle-washing wastewater may contain detergents, oils, grease, metals, sediment, solvents, sand, grit, and other contaminants. Compliance issues here depend on where washing occurs, what is being washed, what products are used, and where the resulting wastewater is discharged. Dealerships should identify all vehicle-washing activities conducted at the facility and confirm that the resulting wastewater is collected, contained, and managed through an authorized system.

Additionally, dealerships should be aware that oversight related to per- and polyfluoroalkyl substances (PFAS) is increasing, including in ways that affect wastewater management, pretreatment, stormwater, product selection, and chemical reporting. EPA has made PFAS a continuing priority through a number of water-program initiatives, including efforts to obtain better information on PFAS discharges and to develop restrictions for industrial wastewater discharges. PFAS is associated with some automotive waxes, detergents, and various automotive components. Given that trend, dealerships should avoid unnecessarily introducing PFAS into washwater and other wastewater streams and, where feasible, should select cleaning products and waxes that do not contain intentionally added PFAS.

1. Wash Bays

Where vehicles are washed indoors in a dedicated wash bay, the dealership should confirm that the wash-bay drain is connected to an authorized discharge or collection system and that any discharge to a POTW complies with sewer-use and pretreatment requirements. Wash-bay wastewater should not be assumed suitable for discharge without confirming what the receiving system is authorized to accept. Dealerships should also ensure that any pretreatment, recycling, or collection equipment associated with the wash bay is properly operated and maintained.

Where feasible, and where required or encouraged by local requirements, dealerships should consider using wash-water recycling systems and cleaning products that are compatible with the treatment, recycling, or discharge method being used. The use of lower-impact or treatment-compatible cleaning products may reduce the pollutant load in wash-bay wastewater but does not eliminate the need to confirm that the wastewater is being managed lawfully.

2. Outside Washing

Outdoor vehicle washing presents greater risk because wash water may migrate to storm drains, paved surfaces, soils, groundwater, or nearby surface waters. Before washing begins, dealerships should clean the wash area of debris and address any visible oil spots, leaks, or accumulated contaminants so they are not washed into the drainage system. The wash area should be designed or managed so that runoff is controlled and wash water is directed to an authorized collection or discharge point.

Dealerships should not discharge outdoor wash water to landscaped areas, to the ground, or to stormwater systems without confirming that doing so is lawful and authorized. Where outdoor washing is conducted, washwater should be collected for recycling, routed to an approved sanitary sewer connection where authorized, or otherwise managed through an approved collection system. Storm drains should be protected from contaminated wash water, and berms, designated wash pads, or similar containment measures should be used where appropriate.

Where feasible, dealerships should use water-efficient practices, recycled water systems, and cleaning products compatible with the selected treatment or discharge method. If vehicle washing is performed by dealership staff during off hours or by outside contractors, the dealership should verify how wash water will be contained, collected, transported, treated, recycled, or discharged, and should retain supporting documentation. The use of a contractor does not eliminate



the dealership's responsibility for wastewater generated on dealership property.

3. On-Site Dry Washing

Dry-wash or low-water cleaning methods may reduce or eliminate wastewater generation and may be appropriate for certain vehicles and operating conditions. These methods generally involve the use of cleaning products that are applied to the vehicle surface and then removed with cloths or similar materials rather than rinsed away with water. Because little or no wastewater is generated, dry-wash methods may reduce drainage and runoff concerns, although dealerships should still manage used cloths, spent materials, and residual cleaning products appropriately.

Dealerships using dry-wash methods should:

- Ensure that the products selected are suitable for the intended use.
- Train employees on application, wiping, storage, and waste handling.
- Recognize that dry washing may be more labor-intensive and may not be appropriate for all cleaning needs.

4. Engine, Undercarriage, and Fifth-Wheel Cleaning

Engine, undercarriage, and fifth-wheel cleaning may generate wastewater containing elevated levels of oil, grease, sediment, and cleaning chemicals. For that reason, these activities

should be performed only where the resulting wastewater can be lawfully contained, collected, and managed. If such cleaning occurs outside of a dedicated wash bay, the dealership should take appropriate measures to prevent wastewater from reaching storm drains or other unauthorized discharge points and should use berms, wash pads, or similar controls where needed.

To the extent practicable, dealerships should:

- Minimize water use during these cleaning operations.
- Remove heavy debris or buildup manually before washing.
- Select cleaning products with the downstream treatment, recycling, or disposal method in mind.
- Handle all resulting wastewater in accordance with applicable local requirements and the general recommendations set out above.

C. Cleaning Service Bays

Service-bay cleaning should be managed with the goal of minimizing wastewater generation and preventing contaminated washwater from entering drains or disposal systems. Never assume that any wastewater may be discharged without confirming that the receiving system is authorized to accept it. Dealerships should maximize use of dry-cleaning methods to maintain service bays and shop floors to reduce water use. Hoses and wash-down practices should be used sparingly, and dealerships should consider dry-shop practices to reduce floor-drain discharges.

Spills and leaks should be addressed promptly using methods appropriate to the size and nature of the release:

- *Small spills* may often be handled with shop towels, wipes, or absorbents, provided those materials are then managed properly.
- *Medium spills* should be contained promptly using absorbents, berms, or similar containment tools so that liquids do not migrate to drains or other areas of the facility.

- *Larger spills* may require a more deliberate response, including containment, segregation of recovered liquids, and management of liquids through the appropriate waste or recycling system. Oil-containing liquids, antifreeze, solvents, and other materials should be collected separately where appropriate, managed through the correct downstream process, and/or recycled responsibly.

If water or cleaning solution is needed for final cleanup, the dealership should use only the minimum amount necessary and should ensure that all resulting wastewater is collected and managed through an authorized system. Cleaning agents should be selected with the downstream treatment, recycling, or disposal method in mind, and employees should be trained not to use service-bay drains as a disposal outlet for vehicle fluids, chemical wastes, or contaminated cleanup residues. Absorbents, towels, wipes, and recovered materials should not be assumed to be nonhazardous and should be managed in accordance with applicable waste-handling requirements.

If an outside company performs service-bay or floor-cleaning work, the dealership should verify the contractor's qualifications, methods, and disposal practices in advance. That review should include, as appropriate:

- Confirmation of insurance.
- Relevant permits or registrations.
- Waste-handling procedures.
- Documentation showing how any wastewater or cleanup residues will be collected, transported, treated, recycled, or disposed of.
- The use of a contractor does not eliminate the dealership's responsibility for ensuring that wastewater and related residues generated on dealership property are managed lawfully.

D. Sanitary (Domestic) Wastewater

Dealerships connected to a municipal sanitary sewer system generally may discharge sanitary or domestic wastewater from bathrooms, kitchens, showers, sinks, wash basins, and water fountains to the sewer system without

pretreatment, provided those fixtures and drains are used only for sanitary or domestic wastewater and not for the disposal of service-bay wastewater, vehicle fluids, chemical wastes, or other non-domestic materials. A drain connected to a restroom, sink, or similar fixture should not be used for any waste stream other than ordinary sanitary wastewater.

Best Management Practices and Recommendations:

- Determine where all bathroom, sink, kitchen, shower, water-fountain, wash-basin, and similar sanitary drains lead.
- Confirm that only approved sanitary wastewater enters those systems.
- Investigate undocumented or historical plumbing connections, especially at older facilities.
- Inspect and maintain septic and other on-site systems regularly.
- Address slow drainage, backups, odors, surfacing wastewater, or similar signs of malfunction promptly.

E. Managing Spent Radiator Coolants

Used radiator coolant generally consists of antifreeze and water and may also contain metals, oil, sediment, and other contaminants picked up during vehicle operation or servicing. Because coolant composition and contamination levels may vary, dealerships should manage used coolant carefully. Before discharging, mixing with other wastes, or handling through ordinary wastewater systems, always confirm that the practice is lawful and authorized.

As a general rule, recycling is the preferred method for managing used coolant. In some cases, a POTW may allow limited sewer discharge of coolant under specific conditions, while other POTWs prohibit the practice. For that reason, dealerships should not discharge used coolant to a sanitary sewer unless the receiving POTW has expressly authorized that practice and all applicable local requirements are satisfied. Used coolant should never be discharged to storm drains, ditches, dry wells, septic systems, onto the ground, or to any other unauthorized location.

Because recycling options are widely available, coolant recycling is often a practical option for dealerships.

Recycling may occur through:

- On-Site Recycling: coolant is recycled in units purchased or leased by the dealership and operated on-site.
- Mobile Recycling: a contractor with recycling equipment visits the dealership and performs recycling on-site.
- Off-Site Recycling: coolant is collected and transported to a qualified recycling facility.

To preserve recycling options and reduce compliance risk, dealerships should:

- Collect used coolant using dedicated equipment such as drain pans, funnels, transfer buckets, and storage containers.
- Transfer used coolant to a dedicated storage container in good condition.
- Use containers with secure lids or closures.
- Keep coolant separate from used oil, fuels, solvents, brake cleaner, shop wastewater, and other wastes.

Dealerships should ensure that employees understand proper coolant-handling practices, including segregation, storage, spill response, and approved downstream recycling or disposal methods. If coolant is sent off-site, dealerships should retain available records of who removed it, where it was sent, and how it was managed.

F. Managing Stormwater

As discussed above, dealership stormwater runoff can become contaminated when it contacts paved areas, vehicle storage areas, leaking equipment, waste containers, floor drains, or other vehicle-related operations. Dealerships should understand how runoff moves across the site, where it discharges, and whether any stormwater permitting, drainage, or water-quality requirements apply.

Dealerships should maintain outdoor areas and drainage features to minimize pollutant exposure, inspect potential sources of leaks or spills, promptly clean up releases, and train employees

to recognize signs of contamination such as stained pavement, unusual odors, damaged vegetation, or recurring residue near drains.

Recommended practices include:

- Regularly inspect tanks, pipes, pumps, catch basins, drums, and other sources of potential leaks or spills.
- Implement spill and leak containment and cleanup procedures promptly.
- Pay attention to vegetation discoloration or loss, odors, stained pavement, and other signs of contamination.
- Sweep paved surfaces regularly to remove dust, debris, and other materials.
- Keep waste and wash water, or other discharges from reaching storm drains.
- Confirm whether any local stormwater-management, drainage-control, detention, or maintenance requirements apply to the site.

VI. Water Conservation

Dealerships depend on reliable water supplies for daily operations, and efficient water use can reduce operating costs, wastewater generation, and strain on local water resources. Water conservation should therefore be treated as part of sound facility management rather than solely as an environmental initiative. In addition to reducing water use, effective conservation measures may also reduce related sewer and, in some cases, energy costs associated with heating, pumping, or treating water. EPA's WaterSense resources promote best management practices for commercial and institutional facilities.

Potential benefits of water-conservation efforts may include lower utility costs, reduced wastewater volumes, improved operating efficiency, and stronger overall environmental compliance. In some locations, utilities or local programs may also offer incentives or cost savings associated with reduced water use or wastewater discharge. Water-conservation measures can support broader facility-maintenance goals by reducing leaks, overuse, and unnecessary wash-water generation.

Dealerships should consider implementing a basic water-management program that includes

identifying major water uses, inspecting for leaks and unnecessary flow, reviewing high-use activities such as vehicle washing and floor cleaning, and evaluating whether equipment or operating practices can be improved. Many useful conservation measures are low-cost or operational in nature.

General no-cost and low-cost water conservation strategies include:

- Posting signs encouraging water conservation by employees.
- Rewarding employees who help implement water conservation.
- Using brooms, vacuums, and/or machines to clean floors and lots.
- Fixing leaking/dripping faucets and valves promptly.
- Encouraging employees to shut off water when it is not actively needed.
- Purchasing water-conserving equipment and devices where appropriate.
- Installing aerators on faucets where suitable.
- Pre-cleaning equipment, parts, and vehicles by wiping excess material off with shop towels or wipes prior to washing.
- Insulating water heaters, coolers, and related pipes where appropriate.

When cleaning vehicles:

- Consider dry-wash or low-water cleaning methods where appropriate.
- Turn off the water when it is not actively needed.
- Evaluate the use of a recycling system to recycle washwater where feasible.

VII. Additional Resources

A. Top Ten Review

1. Learn and follow all federal, state, and local wastewater, stormwater, sewer, and waste-management requirements that apply to dealership operations.
2. Determine where drains, sinks, floor drains, wash-bay drains, separators, catch basins, and collection points lead, and keep information current.

3. Do not discharge maintenance wastes, including oils, coolants, solvents, fuels, or cleaning chemicals, into any drain, pit, septic system, dry well, or other system without confirming that discharge is lawful and authorized.
4. Confirm what the local POTW can accept, and comply with the applicable use, pretreatment, sampling, inspection, and recordkeeping requirements.
5. Implement best management practices for vehicle washing and ensure that washwater is collected and discharged only through an authorized system.
6. Use good housekeeping practices to prevent, contain, and clean up spills and leaks promptly, and do not allow contaminated water or residues to reach storm drains or unauthorized discharge points.
7. Avoid draining oils, coolants, detergents, or other vehicle-related fluids onto the ground, onto outside pavement, or into stormwater systems.
8. Inspect oil-water separators, sand traps, catch basins, and similar systems regularly, and clean or service them as needed to maintain proper operation.
9. Identify any current or historical subsurface disposal systems, including possible Class V motor vehicle waste disposal wells, and confirm whether they were properly closed, authorized, or otherwise addressed.
10. Train employees on wastewater-handling procedures, drain restrictions, spill response, vehicle-washing practices, and the dealership's written compliance procedures, and keep the related records current.

B. Employee Education

Successful dealership wastewater and water-use management depends in large part on employee education and day-to-day operating practices. Employees who understand where drains lead, what materials may and may not be discharged, and how spills, leaks, and wash water must be handled are more likely to prevent contamination and reduce regulatory and property-related risks.



Dealerships should train employees on:

- Good housekeeping practices.
- Where drains, sinks, floor drains, wash-bay drains, and related systems lead.
- What may and may not be discharged to each drain or collection system.
- Spill and leak prevention measures and the proper use of containment and cleanup equipment, tools, and materials.
- Vehicle-washing best management practices, including how to keep wash water out of storm drains and other unauthorized discharge points.
- Proper handling of used oil, coolant, cleaning products, absorbents, and other materials that may affect wastewater quality.
- Consequences of improper water and wastewater management, including contamination of stormwater, groundwater, surface water, or property.
- Water-conservation practices and the dealership's procedures for reducing unnecessary water use.

Where practical, employee training should be supported by written procedures, drain maps, signage, labels, and periodic reminders. Signs and posters can be effective tools, but they should supplement, not replace, clear written instructions and regular training. Dealerships should consider maintaining records of training topics, attendance, and updates to reflect changes in operations or requirements.

C. Additional Resources

Questions related to this Guide should be directed to appropriate dealership compliance personnel, legal counsel, state dealer association, local POTW, or other responsible regulatory authority.

The following resources may also be helpful:

- **CCAR-Greenlink**
OSHA and DOT compliance resources for the automotive industry.
<https://www.ccar-greenlink.org/>
- **EPA Compliance**
EPA compliance and compliance-assistance materials.
<https://www.epa.gov/compliance>
- **EPA Motor Vehicle Waste Disposal Wells**
EPA information specific to Class V motor vehicle waste disposal wells, including current program guidance and compliance considerations.
<https://www.epa.gov/uic/motor-vehicle-waste-disposal-wells>
- **EPA National Pretreatment Program**
Information on pretreatment requirements for nondomestic discharges to POTWs, including program structure, responsibilities, and related guidance.
<https://www.epa.gov/npdes/national-pretreatment-program>
- **EPA Permit Writers' Manual**
Overview of the Clean Water Act regulatory framework, the NPDES Program, the application and permitting process, and other useful information.
<https://www.epa.gov/npdes/npdes-permit-writers-manual>
- **EPA Pretreatment Standards and Requirements**
EPA guidance on the federal pretreatment prohibitions applicable to industrial and commercial users discharging to POTWs.
<https://www.epa.gov/npdes/pretreatment-standards-and-requirements-general-and-specific-prohibitions>

- **EPA Resources for Small Businesses**
EPA resources intended to help small businesses identify and understand environmental compliance obligations.
<https://www.epa.gov/smallbusiness>
- **EPA Underground Injection Control (UIC) Program**
EPA information on underground injection control requirements and related drinking-water protection issues.
<https://www.epa.gov/uic>
- **EPA Vehicle Maintenance and Washing Best Management Practices**
Best management practices for vehicle washing and related runoff control.
<https://www.epa.gov/system/files/documents/2023-01/bmp-vehicle-maintenance-and-washing.pdf>
- **EPA Water Topics**
EPA information on water quality, wastewater, stormwater, septic systems, and related federal water programs.
<https://www.epa.gov/water>
- **EPA WaterSense Best Management Practices**
Water efficiency and water-management best practices for commercial and institutional facilities.
<https://www.epa.gov/watersense/best-management-practices>
- **NADA**
NADA resources and member materials. Any specific contact information or member-only references should be verified before publication.
<https://www.nada.org/>

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ENDNOTES

- 1 See EPA, *Motor Vehicle Waste Disposal Wells*, available at: <https://www.epa.gov/uic/motor-vehicle-waste-disposal-wells>; EPA 816-R-00-018, *Small Entity Compliance Guide: How the New Motor Vehicle Waste Disposal Well Rule Affects Your Business* (Nov. 2000), available at: https://www.epa.gov/sites/default/files/2015-08/documents/class5_small_ent_compl_1.pdf.
- 2 Depending on the discharge pathway and location, required approvals may include, among others, authorization from the local publicly owned treatment works or sewer authority for discharge to the sanitary sewer; compliance with local pretreatment limits, plumbing-code requirements, and oil/water separator requirements; coverage under or exclusion from an applicable NPDES/SPDES permit for any discharge to surface waters or an MS4/storm-sewer system; authorization from the applicable state or EPA Underground Injection Control authority for any discharge to a septic system, dry well, or other subsurface disposal system; and any required state or local industrial wastewater, stormwater, building/plumbing, or environmental permits.
- 3 Residual Designation Authority permitting programs have been under development for years, but as of June 2026, none have been finalized. Since 2019, EPA Region 1 has been working to develop a comprehensive RDA permitting program for private commercial, industrial, and institutional stormwater discharges in the Charles, Mystic, and Neponset River Watersheds in Massachusetts. One goal is to require permits for impervious surfaces that are one acre or larger, with a broad definition of “imperviousness.” Many dealerships have greater than one acre of impervious surface. While EPA Region 1 is not alone in this effort, its website has comprehensive information about RDA programs, with fact sheets, videos, program updates, etc., and is available at the following link: <https://www.epa.gov/npdes-permits/residual-designation-charles-river-watershed-mystic-river-watershed-and-neponset>.
- 4 Discharges to septic systems, leach fields, cesspools, dry wells, floor drains, or other subsurface systems generally should be confirmed with the applicable state or EPA UIC authority and any state or local onsite-wastewater authority. For septic/dry well pathways, the responsible authority is usually the state UIC program or EPA regional program, sometimes with a separate state/local onsite wastewater agency. For more information, see <https://www.epa.gov/uic/primary-enforcement-authority-underground-injection-control-program>.



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