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NADA MANAGEMENT SERIES

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A DEALER GUIDE TO

Water and Wastewater Management



NATIONAL
AUTOMOBILE
DEALERS
ASSOCIATION

The National Automobile Dealers Association (NADA) has prepared this management guide to assist its dealer members in being as efficient as possible in the operation of their dealerships. The presentation of this information is not intended to encourage concerted action among competitors or any other action on the part of dealers that would in any manner fix or stabilize the price or any element of the price of any good or service.

A Dealer Guide to Water and Wastewater Management

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A Dealer Guide to Water and Wastewater Management

PREFACE

This Guide is designed to outline dealership obligations under the federal Clean Water and Safe Drinking Water Acts and to provide dealerships with compliance assistance information. It covers various dealership water uses and disposal practices, including such topics as wastewater pretreatment, vehicle washing, stormwater runoff, and shallow disposal wells. The Guide also covers cost-saving water conservation best management practices.

I. INTRODUCTION

To protect the quality and safety of our nation's water resources, Congress enacted the Clean Water Act (CWA) over 30 years ago. The Act includes several provisions governing how dealership wastewaters should be managed and disposed of. Further, there are state and local laws and water quality agencies that regulate potential sources of water pollution from dealership activities. Since dealerships use and dispose of water in a variety of ways, they must comply with all applicable federal, state and local wastewater management regulations. Fortunately, compliance usually can be achieved through the implementation of relatively simple and cost-effective pollution prevention strategies. This NADA Management Guide is designed primarily to assist dealerships with their wastewater compliance responsibilities, particularly with respect to the federal Clean Water Act and Safe Drinking Water Act.

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. The table of contents lists major issue areas that may be applicable to a specific dealership's operations.

Please note that 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.*** Contact your state and/or local dealership association for information on those requirements.

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

As stated above, wastewaters are regulated by federal, state and/or local rules. Under the federal Clean and Safe Drinking Water Acts, dealership wastewaters are regulated based on where they come from and where they go to. Typically, dealership wastewaters arise from:

1. Shop floor drains
2. Vehicle wash bays
3. Sanitary wastewaters
4. Stormwater runoff

We will discuss each source in turn, and then provide general information on publicly-owned treatment works and national pretreatment guidelines.

- A. Shop Floor Drains** Floor drains traditionally remove the water used to clean service shops, as well as rainwater and snow melt brought in by vehicles. Historically, floor drains also were used to remove a variety of other waste liquids. As a general rule, shop floor drains should not discharge directly to ponds, creeks or other waterways, to storm drains, or to shallow wells. In most jurisdictions, discharging shop floor drains directly to surface waters requires a permit that could be costly to obtain and maintain, assuming the appropriate authorities will even issue one.

More often than not, floor drain wastewaters are combined with sanitary wastes for discharge through sewage pipes to a municipal publicly-owned treatment works (POTW). Prior to leaving dealership property, wastewaters destined for a POTW often are first “pretreated” on-site in oil/water separators or clarifiers. In relatively rare situations, such as where a dealership isn’t connected to a local POTW, floor drain wastewaters are stored temporarily before being pumped out and hauled by truck to a POTW.

While during normal vehicle repair and maintenance activities some vehicle fluids may drip or spill and enter a service area floor drain, as a general rule *waste fluids should never intentionally be poured or washed into a service area floor drain*. These fluids may include engine oils, transmission, power steering and brake fluids, antifreeze coolants, parts cleaners, etc. Again, shop floor drains are primarily for the disposal of wastewaters used to clean service areas and to dispose of rainwater and snow/ice melt brought into the shop by vehicles.

Where practicable, floor drains should be closed in favor of operating a “dry shop,” and “dry shops” should be considered when constructing a new service area. “Dry shops” have their floor drains sealed. “Dry shops” may not be feasible where there is a lot of snow and ice melt in the service area. The following considerations are important to operating a “dry shop” and, in any event, help to reduce floor washwater volume and contamination:

- Sweep shop floors daily to prevent unnecessary dirt and contaminant buildup.
- Use only damp mops for general cleanups and after sweeping.

- Immediately clean up all fluid leaks or spills when they occur with appropriate absorbents or other materials. Properly dispose of clean-up materials.
- Minimize the hosing down of service areas to avoid generating large quantities of contaminated washwater.
- Seal shop floors with impervious materials such as epoxy or other suitable sealants for easier cleanups.
- When using pressure washers or floor machines to clean floors, be sure washwaters are disposed of properly. Even when the floor washing is performed by a contractor, dealerships are responsible for the management of the washwater.

If a “dry shop” isn’t possible, route floor drain wastewaters through a municipal pipe connection to a POTW or collect them in a tank that is periodically pumped out to be hauled to and discharged at a nearby POTW.

B. Vehicle Wash Bays Dealerships often have dedicated bays or areas to wash automobiles and trucks. The concerns posed by these vehicle washing operations vary depending on what is being washed and what cleaners are being used. For example, where no engine, undercarriage, or fifth wheel cleaning is being done, pollution concerns are reduced. As with wastewaters from floor drains, avoid directly discharging vehicle washwaters to surface waters or shallow wells, as a permit may be required which may be difficult and/or costly to obtain and maintain. If possible, use biodegradable cleaners. Also, consider using a washwater recycling system, especially if your dealership is located in an area where the availability of water can become restricted, where water costs are high, or if local ordinances require.

C. Sanitary Wastes Sanitary or domestic wastewaters typically discharge from restrooms, washbasins, and water fountains. These wastewaters preferably should be discharged through sewer pipes to a POTW without prior treatment. Where connection to a POTW is not available or required, sanitary wastes may be treated in a septic system consisting of a septic tank and drain field. Sanitary wastewater treatment is typically regulated and permitted by local authorities.

Septic systems are designed for the treatment of sanitary sewage only. Additional wastes and wastewaters, such as floor drain wastewaters or vehicle washwaters, should not be discharged to the system unless specifically permitted by the appropriate state or local agency. Moreover, and perhaps most importantly, misusing a septic system could result in the contamination of one’s own backyard and in a lowering of the property’s value.

Septic system cleaning should be scheduled on a periodic basis. The need for maintenance is commonly signaled by the slow drainage or poor operation of the system.

D. Stormwater Runoff

Stormwater runoff generally consists of the rain or snow melt that flows off the dealership land, paved surfaces, rooftops, and lawns. As this water flows, it potentially picks up and carries solvents, oils, gasoline, fertilizers, pesticides, etc., which may eventually reach surface waters or infiltrate through soils to ground water. Stormwater runoff is the single biggest threat to the health of our waterways. Although automobile and truck dealerships are not required to have a federally approved discharge permit, they should make reasonable efforts to prevent stormwater contamination. Moreover, many municipalities regulate the flow of stormwater from dealerships to prevent flooding during periods of heavy rain. These regulations may even include stormwater discharge fees and permits designed to control the flow of stormwater, rather than contamination.

E. POTWs and Pretreatment Programs

POTWs are designed primarily to treat sanitary sewage, with sanitary wastewaters collected and transported via a series of pipes (the collection system) to a treatment plant. Contaminants are removed from the sewage at the plant, after which the water typically is discharged to a receiving surface water or onto land. POTWs typically receive wastewaters from homes, commercial facilities and even industrial dischargers. Pretreatment regulations, which may be administered by federal, state, and/or local authorities, require commercial and industrial dischargers to control pollutants that may pass through or interfere with POTW treatment processes or that may contaminate sewage sludge.

The National Pollutant Discharge Elimination System (NPDES), a federal permitting program typically administered at the state or local government level, aims to control and eliminate the discharge of pollutants into the nation's waters. Under the NPDES program, commercial and industrial dischargers, including dealerships, must generally obtain permits if they directly discharge wastewaters into a waterway of the United States.

As noted above, dealerships should avoid directly discharging wastewaters due to the time and cost of obtaining permits. Where possible, dealerships should indirectly discharge wastewaters, such as vehicle washwaters or sanitary wastes, through a sanitary sewer hook-up to a local POTW. These "indirect" discharges typically do not require a permit but are covered under the federal National Pretreatment Program (NPP). The NPP is designed to get industrial and commercial users of sanitary sewer systems to control or pretreat their wastewaters before discharge. Dealerships are subject to the following general pretreatment restrictions and may be subject to specific local prohibitions relating to the discharge of pollutants to POTWs:

- 1) Discharges that may create fires or explosions in the collection system or POTW, e.g., a large slug of waste gasoline.
- 2) Corrosive discharges including any discharges with a pH less than 5.0, unless the POTW is specifically designed to handle such wastes.
- 3) The discharge of solid or viscous pollutants in amounts that will obstruct the flow in the collection system or POTW.

- 4) Pollutant discharges in quantities sufficient to interfere with POTW operations.
- 5) Discharges with temperatures above 140 degrees F (40 degrees C) when they reach the POTW, or otherwise hot enough to interfere with biological processes.
- 6) Discharges of petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass-through at the POTW.
- 7) Discharges which result in the presence of toxic gases, vapors, or fumes at the POTW in quantities that may cause acute worker health and safety problems.
- 8) Discharges of trucked or hauled pollutants, except if and where designated by the POTW.

Along with the national pretreatment guidelines, many POTWs impose their own local pretreatment standards that may be stricter. Local POTW operators set pretreatment discharge standards based on the particularities of their own discharge permits, on the nature of their POTWs' operation, and on such unique factors as POTW location, climate, and upstream use. Since many POTWs have their own local standards (e.g., a prohibition on the discharge of radiator coolant), dealerships should stay on top of them to ensure the proper disposal of wastewaters to the municipal collection system.

III. SPECIFIC DEALERSHIP WASTEWATER ISSUES

Listed below are the major dealership wastewater issues. Their application to a particular dealership facility will depend on facility operations, design and location. For each issue, we have suggested best management practices designed to prevent pollution. Employee training is important to the proper management of dealership wastewater. Dealers should instruct employees regarding appropriate operation and maintenance procedures and proper wastewater disposal practices.

A. General Recommendations

To help ensure that wastewaters discharged to POTWs meet national and local pretreatment discharge requirements, dealerships *connected* to municipal sanitary sewers should:

- Determine where each dealership drain flows;
- Comply with the eight national pretreatment discharge standards listed above;
- Notify and obtain permission from the local POTW for the types and amounts of wastewater discharged to the sanitary sewer system;
- Obtain copies of and comply with applicable local POTW pretreatment requirements, including the use of oil/water separators, oil/grit separators, or sand traps;
- Never discharge dealership wastewaters to storm sewer drains.

Dealerships *not* connected to municipal sanitary sewers should:

- Determine where each floor drain in the dealership flows;
- Avoid discharging dealership wastewaters into storm sewers;
- Avoid discharging dealership wastewaters into septic systems, leach fields, cesspools, or dry wells unless permitted by the state or locality;
- Collect wastewaters in holding tanks and contract with a disposal company for on-site recycling or removal for disposal at a POTW.

Contaminated wastewater

Though unlikely, dealership wastewaters may become contaminated through contact with hazardous substances or after too much recycling. If contamination occurs, the whole batch of wastewater may be considered hazardous.

It is important to avoid contaminating wastewater. Such contamination could cause a dealership to fall within a larger hazardous waste generator class and thus face costly new regulations. Use good housekeeping practices and avoid mixing wastes into wastewater.

If you are unsure as to the condition of your wastewater, have it tested. If it tests as hazardous, follow these steps:

- Do not dispose of hazardous wastewaters yourself. Avoid disposing hazardous wastewaters in any drain, pond, cesspool, dry pit, disposal well, or any other place.
- Contract with a hazardous waste disposal company to remove the hazardous wastewater from the dealership, and ensure that it will be properly managed.

B. Vehicle Washing

Wastewaters from vehicle washing operations often contain pollutants such as detergents, oils, metals, solvents, sand, grit, and other contaminants.

1. Wash Bays

If washing vehicles indoors in a wash bay, follow all of the applicable general recommendations listed above (III. A). Wherever possible or when required by local law, recycle wash bay wastewaters and use biodegradable cleaning solutions.

2. Outside Washing

Washing vehicles outside poses a risk of surface or groundwater contamination. Prior to washing, sweep wash areas or pads free of debris and clean up all oil spots or leaks with absorbents. The flow of washwater should be controlled by berming cleaning areas and by ensuring that waste washwaters are directed into appropriate collection drains. Discharge washwater into a sanitary sewer following the recommendations listed above (III. A), or apply it to a landscaped area where it can percolate, or collect and recycle it. Avoid disposing washwaters into stormwater drains by sealing them where necessary.

Use recycled washwater and biodegradable cleaning solutions if feasible.

Many dealerships wash vehicles during off hours utilizing dealership staff or washing service contractors. Ensure that mobile washing contractors have proper insurance, permits, ID numbers, disposal records, cleaning supplies, and waste destination sites.

- 3. On-Site Dry Washing** This method of vehicle cleaning involves the use of products that are sprayed onto dirty vehicles and wiped off with cloths. No wastewater is produced and the products used usually contain silicones or polymers that do not scratch a vehicle's finish when wiped off and offer enhanced paint and finish protection. Although this method has obvious advantages, the process takes longer than the previous methods described and is labor-intensive.

- 4. Engine, Undercarriage and Fifth-Wheel Cleaning** Wastewater from engine, undercarriage and fifth-wheel cleaning may contain contaminants such as oils, greases, and harsh detergents. When conducting these washing operations, follow the applicable general recommendations listed in III. A, above. If cleaning outside of a wash bay, seal any storm sewer drains beforehand and berm the wash area. Do as much of the cleaning as possible using brushes. Use wash pads to collect excess water.

- C. Cleaning Service Bays** See the discussion in the Overview under "Shop Floor Drains" (II. A). Everyone values nice clean shop areas including shop floors. Ideally, dealerships should maximize the use of "dry methods" for cleaning and maintaining shop floors including the use of dry mops, brooms, rags, absorbents and floor cleaning machines to minimize the generation of wastewater. Hoses should be used sparingly and, if possible, shop floor drains should be sealed. Remember to follow the general recommendations listed above (III. A).

Spills and leaks should be addressed as follows:

- For small spills, use shop towels and send them to an industrial laundry, or use disposable wipes and dispose of them properly.

- For medium spills (i.e., those that can be contained without difficulty), use absorbent and portable berms as temporary holding areas to contain liquids during cleanup. Soak up liquid and store in an appropriate container. Wipe with shop towels or wipers.

- For larger spills, use absorbent and berms as necessary. Use a hydrophobic mop for cleaning up spills containing oil and deposit in the dealership used oil storage. Use a regular mop for cleaning up antifreeze and properly manage any recovered antifreeze. Use shop wipes or towels to clean up any remaining film. If necessary, use a small amount of a biodegradable cleaner and water for final clean-up.

Dealerships can be held liable if their wastewater is improperly managed by others. Thus, if an outside company is used to perform cleaning services, investigate its reliability and reputation by asking for references, proof of insurance, and

copies of any regulatory permits, ID numbers, and disposal records. Make sure acceptable cleaning solutions are used and that the wastewater generated is disposed of in an approved fashion and location.

D. Sanitary (Domestic) Wastewater

Dealerships connected to municipal sanitary sewer collection systems and to POTWs need not pretreat the sanitary or domestic wastewaters discharged from their bathrooms, kitchens, showers, wash basins, and water fountains. Of course, this assumes that these facilities are not used for the disposal of anything other than sanitary or domestic wastewater.

In certain areas, dealerships are not hooked up to a municipal sanitary sewer system. In most circumstances, such dealerships discharge their sanitary or domestic wastewaters to a septic system, leach field, or small packaged sewage treatment plant. This also typically may be done without pretreatment, assuming only sanitary or domestic wastewaters are being discharged. As discussed in section H below covering underground injection wells, a discharge to the subsurface of non-sanitary wastes, if allowed at all, requires a difficult to obtain and expensive permit. Dealerships particularly should avoid the discharge of service bay wastewaters, including spent coolants, to avoid on-site pollution and reduced real estate values.

Best Management Practices and Recommendations:

- Determine where all bathroom, sink, kitchen, water fountain, shower, and wash basin drains flow.
- Avoid pouring any non-sanitary waste products, especially chemical wastes, down these drains.
- Regularly inspect and maintain septic systems for proper operation.

E. Oil-Water Separators and Other Pretreatment Options

Oil-water separators (OWS) are temporary underground holding chambers for wastewater that are often used to pretreat dealership wastewaters before discharge to a POTW. OWS sludge is the material that settles out over time and accumulates at the bottom of an oil-water separator unit. It may be semi-solid or liquid and is made up of dirt particles, oils, solvents, and other materials. When the sludge level reaches a maximum depth, it begins to discharge to the sewer system. Thus, OWS systems require periodic inspection and cleaning. Cleaning frequency is dependent on the amount of solids and oils introduced by the dealership into the drains leading to an OWS and its design capacity. Other dealership wastewater pretreatment devices include oil/grit separators and sand traps which also must be properly maintained to work well.

While the characteristics of OWS sludge vary somewhat, it is typically is *not* hazardous. As a rule of thumb, OWS sludge is considered non-hazardous under federal law if:

- The oil in the sludge meets EPA's used oil definition.
- No hazardous waste has been mixed in with the sludge.

- Total halogens are less than 1,000 parts per million.

To keep OWS sludge clean, avoid pouring hazardous wastes down the drain.

Requirements governing the pump-out and off-site management of OWS sludge vary at the state level. Some states require no testing of the sludge prior to pump-out, others consider it potentially hazardous and require testing, and still others require that it be treated as a “special” or hazardous waste. With these variations in mind, it is essential to:

- Contact the state dealer association and ask how OWS sludge is regulated.
- Determine, through testing or general knowledge, if the sludge is non-hazardous.
- If the sludge tests as hazardous or is assumed to be hazardous, be sure the pump-out hauler is licensed to handle it as such and does so.

As with all wastes sent off-site, keep a copy of the manifest or other shipping paper, investigate the hauler’s legal and financial qualifications, and ascertain where the sludge is going and that it got there. Note: dealerships around the country have incurred significant Superfund liability due to the mismanagement of their OWS sludge!

F. Spent Radiator Coolants

Spent radiator coolants are solutions of antifreeze and water. These coolant wastes often contain small levels of heavy metals such as lead, cadmium, and chromium and occasionally are contaminated with oils. Antifreeze, or ethylene glycol, is itself a petroleum-based alcohol that rapidly breaks down in most wastewater treatment systems. Thus, many POTWs allow for small amounts of coolant wastes to be discharged into the sewer system. Other POTWs prohibit this practice. It is *never* appropriate to discharge coolant wastes into storm drains, ditches, dry wells, or septic systems. The preferred method for handling coolant wastes is to recycle them.

Since there are many on-site and off-site recycling options available, waste coolant recycling is feasible for almost any dealership. The three principal options are:

- On-Site Recycling: coolant waste is recycled in units purchased or leased by the dealership. They are located on-site and operated by dealership employees.
- Mobile Recycling: contractor with a van or truck equipped with a recycling unit visits the dealership and recycles the waste coolant on-site.
- Off-Site Recycling: waste coolant is picked up from the dealership and transported to a recycling company, which may also offer recycled coolant products to the dealership.

When collecting waste coolant prior to recycling or disposal, minimize the risk of contamination by using only dedicated equipment (e.g., drain pans, funnels, transfer buckets, etc.). Once drained from a vehicle, transfer waste coolant antifreeze immediately to a dedicated storage container. Containers should be in good condition with no leaks and lids that can be secured.

G. Stormwater

Stormwater runoff is perhaps the largest source of water pollution in the United States. As such, EPA requires many industry sectors to obtain stormwater discharge permits from the states in which their facilities are located. *Automobile and truck dealerships are not required to have federally-mandated state stormwater permits.* On the other hand, state and local authorities are free to require dealerships to obtain such permits if they elect to.

Whether or not a permit is required, snow, rain, and ice-melt, and other waters that pass through dealership facilities may become contaminated before entering stormwater drains. Such drains typically lead to municipal stormwater collection facilities, to retention ponds, or directly to surface waters such as streams, creeks, lakes, and rivers. The following recommendations and practices will help prevent stormwater runoff contamination at dealerships:

- Outside vehicle storage areas and other paved surfaces should collect stormwater flows through drains and gutters and pass them to a municipal or on-site collection system.
- Regularly inspect tanks, pipes, pumps, catch basins, drums, and other sources of potential leaks or spills. Implement spill and leak containment and cleanup procedures if they occur.
- Pay attention to vegetation discoloration or loss, odors, and other signs of contamination.
- Regularly sweep paved surfaces to remove dust, debris, grit and sand.
- Avoid washing out service bays/areas onto outside paved areas.

H. Underground Injection and Class V Motor Vehicle Disposal Wells

Historically, dealerships across the United States discharged a variety of hazardous and nonhazardous fluids into injection wells. The federal Safe Drinking Water Act's Underground Injection Control (UIC) Program provides safeguards so that injection wells do not endanger current and future underground sources of drinking water.

The UIC Program defines an injection well as any bored, drilled or driven shaft or dug hole that is deeper than it is wide and that is used to discharge fluids underground. There are five classes of underground injection wells. If they have any underground injection wells, dealerships typically need to be most concerned about Class V motor vehicle waste disposal wells.

Motor vehicle waste disposal wells are those that receive or have received fluids from vehicular repair and maintenance activities. Dealership motor vehicle waste

disposal wells typically are tied to service area floor drains or sinks. They may also handle vehicle washing and domestic wastewaters. While the wells themselves usually are shallow septic systems or dry wells, any underground system that receives motor vehicle waste fluids can be considered a motor vehicle waste disposal well (e.g., cesspools, catch basins, sink holes, underground vaults, or drain tanks).

Dealership motor vehicle waste disposal wells are covered by federal rules governing underground injection control for Class V injection wells. The rules state that:

- New motor vehicle waste disposal wells are banned as of April 5, 2000. Dealerships may not install new drains, sinks or septic systems that receive fluids from vehicular repair and maintenance activities and discharge them directly into the subsurface.
- Existing motor vehicle waste disposal wells generally are banned in “ground water protection areas” and other sensitive ground water areas identified by the states. Some states have banned motor vehicle waste disposal wells statewide.
- The states or EPA may grant a temporary or permanent waiver to allow a dealership to permit an existing motor vehicle waste disposal well. Such permits are rare and expensive to obtain and maintain. A permit may be useful if the dealership is waiting to hook up to a municipal wastewater collection system.

The federal rules and state laws govern closure of motor vehicle waste disposal wells. It's best to contact the state UIC program to obtain definitive information on proper well closure. Note that although most wells hooked up to service area drains must be closed, those that handle only domestic wastewater and/or vehicle washwater typically may remain open.

For more information, contact the appropriate state UIC program office or obtain the EPA guidance document entitled “How the New Motor Vehicle Disposal Rule Affects Your Business” at <http://www.epa.gov/safewater/uic/smallcompliance.pdf>.

IV. WATER CONSERVATION

Dealerships and the communities they operate in depend on safe and secure water supplies, so it is important to protect and conserve water resources. Conserving water and using it efficiently can lower a dealership's water, sewer and energy bills by as much as 30 percent. Benefits include:

- Financial savings, particularly if the dealership is billed by actual usage.
- Energy savings by using less energy for heating, pumping, and treating water.
- Less wastewater, which cuts sewer service costs. Some utilities offer financial incentives for reduced wastewater output.

- Positive publicity stemming from the dealership's environmental protection efforts.

General no-cost and low-cost water conservation strategies available to dealerships include:

- Posting signs encouraging water conservation by employees.
- Rewarding employees who help implement water conservation.
- Using brooms, vacuums, and/or machines instead of hoses to clean floors and lots.
- Fixing all leaking or dripping faucets and valves as soon as possible and making sure hose bibs are watertight.
- Encouraging employees to shut off water when soaping up hands at sinks.
- Purchasing water-conserving equipment and devices.
- Installing aerators on all faucets.
- 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.

When cleaning vehicles:

- Consider dry washing as described above (III. B).
- Turn off the water between rinses.
- Use a wastewater recycling system to recycle vehicle washwater.

For efficient landscape irrigation:

- Design (or redesign) landscaping to minimize maintenance and water use.
- Plant native plants adapted to the local climate and rainfall.
- Use mulch around plants and trees to retain moisture.
- Minimize turf.
- Use drip and other low-flow irrigation devices.

V. KEY THINGS TO REMEMBER AND ADDITIONAL RESOURCES

A. A Top Ten Review

- 1) Learn about all applicable federal, state and local wastewater rules and restrictions.
- 2) Educate local POTW operators about dealership wastewaters discharged to the municipal sanitary sewer system.
- 3) Avoid discharging any motor vehicle maintenance wastes into any drain, system, or pit, especially if hooked up to a shallow well.
- 4) Know where all dealership drains lead to.
- 5) Implement best management practices for vehicle washing activities.
- 6) Avoid discharging excessively hot water to sanitary sewer systems.
- 7) Use good housekeeping techniques to help prevent, contain and clean up spills and leaks.
- 8) Avoid draining oils, coolants and other vehicle fluids on the ground or on outdoor pavement.
- 9) Periodically inspect oil/water separators and stormwater catch basins for the presence of excessive oils or sludge. Have them cleaned when necessary.
- 10) Close or get a permit for any Class V motor vehicle disposal well.

B. Employee Education

Successful dealership wastewater and water use management will involve employee education regarding the issues discussed in this Guide. Educated employees are likely to minimize wastewater contamination, thereby helping to avoid potential dealership liabilities. Train on:

- Good housekeeping practices.
- What may and may not go down the drains, depending where they lead to.
- Suitable spill and leak prevention measures and the proper use of containment and cleanup equipment, tools and materials.
- Vehicle washing best practices.
- The consequences of improper water and wastewater management (e.g., drinking water contamination, property contamination, etc.).
- Water conservation best practices.

Signs and posters are effective tools to remind employees of these items.

C. Additional Resources

Questions on issues covered by this Guide may be directed to NADA/ATD Regulatory Affairs at 703-821-7040 or regulatoryaffairs@nada.org. See also the sites listed below.

EPA Office of Water

Provides comprehensive information on the Clean Water Act and federal water regulations. <http://www.epa.gov/water>.

EPA UIC Class V Program

Provides comprehensive information on the federal UIC Class V injection well program. <http://www.epa.gov/safewater/uic/classv.html>.

EPA Office of Enforcement and Compliance Assurance (OECA)

Provides detailed Clean Water Act compliance assistance information. <http://www.epa.gov/compliance/assistance/bystate/cwa/index.html>

CCAR-Greenlink

CCAR-GreenLink is the National Automotive Environmental Compliance Assistance Center for the automotive industry, operated in coordination with the Environmental Protection Agency. <http://www.ccar-greenlink.org>.

Pollution Prevention Fact Sheets

P2 fact sheets on automotive service, including radiator coolant and floor cleaning. http://www.epa.gov/region09/cross_pr2/p2/autofleet/factauto.html.

Small Business Environmental Home Page

Lists small business assistance advisors and websites for assistance with environmental regulatory compliance. Under “Industry Sectors,” click on “Automotive” for related links. <http://www.smallbiz-enviroweb.org/industry/industry.html>.

Small Entity Compliance Guide: How The New Motor Vehicle Waste Disposal Well Rule Affects Your Business

Downloadable guide on Motor Vehicle Waste Disposal Wells. www.epa.gov/safewater/uic/smallcompliance.pdf.

Water Conservation

EPA site for water conservation measures. <http://www.epa.gov/owm/water-efficiency/index.htm>.

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Resources addressing specific topics on environmental and other regulatory topics are on the members only section of the NADA website.

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