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DOES YOUR GOLF COURSE EQUIPMENT WASHDOWN FACILITY COMPLY WITH FEDERAL AND STATE REGULATIONS?

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In an era of ever tightening regulatory requirements, it may be prudent to take a look at your golf course wash down operations. The area where equipment is washed varies from golf course to golf course. Some courses wash down their equipment on bare ground with no effluent containment. Others have a cement wash pad where the effluent may either run off onto bare ground or be directed to a drain from which the water leaches into the soil or is piped to a holding tank or municipal or private treatment system. Still other courses have wash down systems which treat the waste water before recycling it or disposing it onto the ground or into a public treatment system.

In 1977 the Clean Water Act (CWA) became the new name for the Federal Water Pollution Control Act of 1948 (<http://www.epa.gov/npdes/pubs/cwatxt.txt>). Under the CWA, EPA has implemented pollution control programs such as setting wastewater standards for industry. The EPA has also set water quality standards for all contaminants in surface waters.

EPA's [National Pollutant Discharge Elimination System \(NPDES\)](#) permit program controls discharges. The NPDES is a permit program implementing the Clean Water Act's prohibition on unauthorized discharges by requiring a permit for every discharge of pollutants from a point source to waters of the US.

Under the CWA "pollutant" is defined as "dredged spoil, solid waste, incinerator residue, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials, heat, wrecked or discarded equipment, rock, sand, cellar dirt and industrial, municipal, and agricultural waste discharged into water."

(<http://water.epa.gov/lawsregs/guidance/wetlands/sec502.cfm>)

"Point source" means any discernible, confined, and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel, or other floating craft, from which pollutants are or may be discharged (<http://www.epa.gov/lawsregs/laws/cwa.html>). Only the EPA or a state with permitting authority can issue a permit. State issued permits are subject to review by EPA. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters.

Wastewater from the washing of golf course equipment is considered a pollutant. It is up to each state to enforce the federal regulations of the CWA. Many of these states also have added

their own wastewater discharge provisions in addition to the federal standards. To see what your state's local regulations are, please follow this link.

Connecticut

The Connecticut Department of Environmental Protection (CT DEP) meets federal standards for implementing its federally delegated Clean Water Act (CWA) NPDES enforcement programs.

Delaware

Under both state and federal laws and regulations, any discharge of pollutants from a point source to state surface waters is unlawful unless sanctioned by a permit. Such permits are administered under the National Pollutant Discharge Elimination System (NPDES). The fundamental goal of an NPDES permit is just that, to eliminate discharge of pollutants.

Maine

The washing of golf carts and mowing machines is allowed with the following prohibitions and recommended best management practices:

- **Engine and undercarriage washing is prohibited.** Cleaning operations should minimize the detachment of paint residues, heavy metals or any other potentially hazardous materials from surfaces.
- Equipment washing should occur, where possible, on an impermeable surface (i.e., concrete, asphalt, plastic or other) and utilize an area that extends to a minimum of four (4) feet on all sides of the equipment so that wash water and overspray falls initially on the impermeable surface. From the impermeable surface, wash water should then be directed to a vegetated area. Information on temporary berms and magnetic storm drain covers and suppliers is attached to this guidance.
- Equipment should not be washed near uncovered repair areas or chemical storage areas such that chemicals can be transported in wash water runoff. All wash water runoff should drain away from a shop repair or chemical storage area.

Maryland

The industrial surface water discharge permit is a combined state and federal permit under the National Pollutant Discharge Elimination System (NPDES). This permit is issued for industrial facilities that discharge to State surface waters. The permit is designed to meet federal effluent guidelines when applicable and also ensure the discharge satisfies State water quality standards.

All industrial, commercial, or institutional facilities that discharge wastewater (or storm water from certain facilities) to surface waters of Maryland may need this permit. Alternatively, an industrial discharge to the municipal wastewater collection system may require a pretreatment permit.

Massachusetts

Although the NPDES program has not been delegated to the state, EPA evaluated MassDEP's surface water discharge inspection and enforcement program. MassDEP's organization is more complicated for water than for the other media. In MassDEP, the Bureau of Waste Prevention (BWP) and the Bureau of Resource Protection (BRP) share responsibility for the Water program. BWP is responsible for discharges from industrial facilities but not for sanitary wastewater. Golf equipment wash down water is considered hazardous waste. If not discharged to a sewer, then the operator had to either get:

- 1) NPDES permit
- 2) Groundwater Discharge Permit
- 3) Holding tank

If connected to a sewer system, then the operator must contact the sewer authority and explain what the wastewater is and the amount and get permission to dump in the sewer. This covers only the wash water discussion and not spills of any kind. Referred to 314 CMR 5

<http://www.mass.gov/dep/service/regulations/314cmr05.pdf>

New Hampshire

NH golf courses are required to register their wash down areas with the state. The wash down process can not include any soaps or chemicals or high pressure wash mechanisms and may NOT flow towards any water system or wetlands. Normal wash water is considered to have trace pollutants in amounts small enough for normal flat ground discharge to absorb. Discharge to a body of water or wetland is considered a federal violation. Discharge to a sewer system is allowed also.

New Jersey

NJDEP has a strong compliance and enforcement program. In most instances, NJDEP exceeded the national average for inspection coverage, identifying and addressing significant violators. The NJPDES permitting program shall regulate and issue permits for the discharge of pollutants to surface and ground waters of the State, pursuant to the State and Federal Acts, except for those activities specifically prohibited or exempted pursuant to N.J.A.C. 7:14A-2.4(d) and 2.5, respectively.

Basic washing is best practices. Use of chemicals or aggressive washing techniques requires a permit under http://www.state.nj.us/dep/dwq/7_14a/Sub02rule.pdf

New York

New York prohibits the direct or indirect discharge of any substance that "shall cause or contribute to" a condition in violation of water quality standards. In general, the applicable regulations depend on whether your facility discharges directly to a receiving stream/river ("[direct discharge](#)") or to a publicly owned treatment works ("[indirect discharge](#)"). Basically it is considered best practices for normal wash water. They do back up the federal standards for wastewater. There is a discharge permit required if not connected to a public source system.

Pennsylvania

Pennsylvania prohibits the discharge of any substance resulting in pollution, Pennsylvania also has a provision prohibiting discharge without a permit, which it has used for nonpoint sources, but the provision applies only to industrial wastes.

The [Federal Clean Water Act](#) and the Pennsylvania Clean Streams law require wastewater dischargers to have a permit establishing pollution limits, and specifying monitoring and reporting requirements. National Pollutant Discharge Elimination System (NPDES) permits regulate household and industrial wastes that are collected in sewers and treated at municipal wastewater treatment plants. Permits also regulate industrial point sources.

Rhode Island

Hazardous Waste and Hazardous Substances - No person shall discharge hazardous waste or hazardous substances into any waters of the State or discharge hazardous waste or hazardous substances into a wastewater treatment works, except as in compliance with the provisions of Chapter 46-12, or other applicable chapters of the Rhode Island General Laws or these regulations, and in accordance with the terms and conditions of an approval issued by the Director or municipality as may be required under the Rhode Island Pretreatment Regulations.

Oil, Petroleum Products, Solvents - No person shall discharge oil, petroleum products or industrial solvents into treatment works designed to treat or control only wastewater or storm water unless it conforms with Federal, State and local pretreatment requirements. No person shall discharge oil or petroleum products into the waters of the State except as in compliance with the provisions of Rhode Island General Laws Chapter 46-12, or other applicable chapters of the Rhode Island General Laws or these regulations, and in accordance with the terms and conditions of an approval issued by DEM thereunder.

Vermont

Water used in washing cars, trucks, and other equipment may contain a wide range of contaminants including oil, other hydrocarbons, metals, detergents, road salt, and grit. These pollutants can be toxic and harmful to living organisms, including fish and the people who eat the fish. It is important to keep these contaminants out of our surface and drinking water. **The Department of Environmental Conservation's (DEC) policy** (dated 12/09/02) **covers only the wash water generated from washing the exterior of vehicles** (cars, trucks, buses, and light or heavy equipment). It supersedes the parts of the "DEC's Floor Drain Procedure" (signed October 8, 1993) that refer to Vehicle washing.

There are four options for handling your vehicle wash water:

1) Install a closed system with no discharge

Operate a "closed loop system" by recycling your wash water. Because no wastewater is discharged to the ground's subsurface or surface, this would not require a UIC permit. However, if it includes a holding tank, the tank will need to be permitted by the DEC Regional Office in your area.

2) Install a holding tank

Install a holding tank to collect the wash water from the floor drain and have the contents disposed of properly. Holding tanks can be installed and pumped out as needed by a qualified hauler. The holding tank contents must be disposed of at an approved disposal facility (i.e. a municipal wastewater treatment facility.) Holding tanks require a permit from the DEC Regional Wastewater Office in your area (see contact info on back). The town may also need to approve the disposal at its wastewater treatment facility.

3) Discharge to municipal sanitary sewer

Connections to the local wastewater treatment facility must be permitted by the Regional Offices and may require adequate pretreatment (e.g. an oil/water separator.) The town may also have an approval process for connections to its wastewater treatment facility.

4) Limit washings to 30 or fewer vehicles per week

If the following conditions are met, the wash water from 30 or fewer vehicle washings per week may be discharged to the **ground surface**.

A) Whether these vehicle washings occur indoors or outside, the following conditions must be met:

- i. The wash water going to the ground surface must sheet flow over a vegetated area and infiltrate or evaporate on-site, therefore the site should not be graded in a way that encourages the collection of the wash water.
- ii. The wash water must not cause soil erosion and must not reach waters of the state, either directly or through storm water drains or ditches.
- iii. Only non-phosphorus soaps may be used.
- iv. The use of acids, bases, metal brighteners and degreasing agents as well as pressure washing engines, undercarriage washing and engine cleaning are all prohibited.

B) If the vehicle washing takes place indoors (discharging to ground surface), the following **additional** conditions must be met:

- i. All washing must occur in a wash bay that has a floor drain and is physically separated from where vehicles are serviced.
- ii. An oil-water separator must be installed on the floor drain piping.
- iii. The floor drain must be registered with the UIC program (call the UIC Program, 802-241-3822).
- iv. Hazardous materials can't be stored in the wash area unless adequate containment is provided.

C) If the vehicle washing takes place outside; the following **additional** conditions must be met:

- i. Whenever possible, the washing should occur on an impermeable surface (i.e. concrete, asphalt, plastic, or other) and then sheet flow over a vegetated area.