

**STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION**

**STAFF REPORT FOR REGULAR MEETING OF DECEMBER 4-5, 2008
Prepared on October 24, 2008**

ITEM NUMBER: 32

SUBJECT: Waste Discharge Requirements for U.S. Department of Interior Bureau of Land Management Vehicle Wash Facility, San Benito County, Order No. R3-2008-0062

KEY INFORMATION

Discharger:	U.S. Department of Interior Bureau of Land Management (BLM)
Facility Name:	BLM Vehicle Washing Facility
Facility Address:	7100 Coalinga Road San Benito County
Type of Waste:	Industrial wastewater – Vehicle Wash Wastewater
Treatment:	Sump, Clarifier Tank System
Disposal:	Leach field
Facility Design Capacity:	3,500 gallons per day
Facility Discharge Volume:	Average 2,400 gallons per day
Existing Order:	Unpermitted - Existing Site
Recycling Requirements:	None
This Action:	Adopt Waste Discharge Requirements Order No. R3-2008-0062

SUMMARY

The U.S. Department of Interior Bureau of Land Management (Discharger) owns and operates a vehicle wash facility located at 7100 Coalinga Road, in an unincorporated area of San Benito County. The vehicle wash facility has been in operation for approximately 15 years and the Discharger uses the facility to decontaminate the Discharger's vehicles driven at the Atlas Asbestos Mine Superfund Site. The vehicle wash facility is open year round; activities that take place at the site are truck washing and equipment and vehicle storage. The Discharger washes vehicles after they have entered and exited the Clear Creek Management Area. Fluid from the washing activities collects in a sump, then flows through several clarifier tanks, and finally into a subsurface leach field. The vehicle wash facility wastewater include concentrations of motor oil, volatile organic compounds, and metals. The vehicle wash wastewater treatment system consists of a sediment interceptor and clarifier tank system, which functions the same as an oil/water separator.

The USEPA's UIC Program prohibits the discharge of automotive wastes to shallow injection wells such as leach fields. USEPA Region IX is allowing the Discharger's disposal of wash wastewater at the facility if the Discharger complies with Water Board's regulations and conducts monitoring of the wash rack wastes. The Discharger must ensure that inorganic and organic chemicals associated with vehicle wash wastewater are not discharged to the leach field in order to protect beneficial uses of nearby surface waters and groundwater. Water Board staff recommends regulating the discharge via individual Waste Discharge Requirements (WDR) Order No. R3 -2008-0062.

DISCUSSION

The Discharger contacted Water Board staff on September 15, 2006, requesting permitting information for the subject and possibly future vehicle wash facility in the Clear Creek Management Area (Atlas Asbestos Mine Superfund Site USEPA ID# CAD980496863). Water Board staff informed the Discharger that prior to installation and operation of the vehicle wash facility 15 years ago, the Discharger should have either: 1) applied for a wastewater disposal permit from San Benito County Environmental Health, 2) submitted an application to the Central Coast Water Board to obtain authorization for a wastewater discharge, or 3) contacted the United States Environmental Protection Agency to obtain a permit to dispose of wastewater via a shallow injection well as part of the Underground Injection Program. Since the Discharger does not have a wastewater discharge permit from any these regulatory agencies, the Discharger is illegally discharging wastewater to the leach field.

The Discharger's vehicle wash facility is located in an unincorporated area of San Benito County. It consists of an office building, a mobile home, a shower trailer, a vehicle wash rack with dedicated water tank and leach field, an aboveground 2,000-gallon fuel tank, a potable water well system within a pump house, a 5,000-gallon water tank, a liquefied petroleum gas tank, and a conventional septic tank/leach field system.

The vehicle wash facility is open year round; activities that take place at the site are truck and equipment washing and vehicle storage. The Discharger washes vehicles after they have entered and exited the Clear Creek Management Area. Fluid from the washing activities collects in a sump, then flows through several clarifier tanks, and finally into a subsurface leach field. The clarifier tank system consists of three tanks plumbed in series with a total capacity of 1,500 gallons. The leach field is a single trench line approximately 60-feet long by 1.5-feet wide and 10-feet deep filled with 1.5-inch gravel. Two percolation tests performed along the leach field on February 28, 2007, indicate percolation rates ranging from 1.1 to 19.60 minutes per inch. The Discharger regularly removes and disposes of solid sludge material from the clarifier tanks. The chemicals of concern in this solid waste material are primarily metals and asbestos-laden soils. Regular vehicle maintenance occurs off of the site therefore the Discharger does not perform degreasing at the vehicle wash facility.

It takes approximately 10 to 15 minutes to rinse off any dust accumulated from the exterior of the BLM vehicles during the dry season. The average time to rinse off vehicles increases during the wet season to approximately 25 minutes but may be as much as 45 minutes to remove mud. The Discharger rinses inner fenders and undercarriages to remove any accumulated dust and mud. The policy for cleaning the inside of the vehicles is to vacuum all appropriate surfaces that collect any earth materials and then wipe down the interior using a damp cloth. The Discharger rinses this cloth in a bucket of water that is later disposed of into the carwash sump. At no time is any soap used in the process. The Discharger places the material from the vacuum cleaner into the sump and ships it off as asbestos-containing material (hazardous waste). About 600 BLM vehicles washes occur per year on average at the vehicle wash facility, which requires approximately 60,000 gallons of water per year.

Water Board staff requested the Discharger perform a background assessment of the water supply well, vehicle wash facility sludge, surrounding soils, and wastewater characteristics at the Discharger's vehicle wash facility prior to consideration of WDR Order No. R3-2008-0062. The water supply well at the vehicle wash facility was dry down to 190-feet below grade surface. The Discharger states this is typical of the well and water supply is usually brought in and placed in the water storage tank. Sludge and clarifier wastewater had concentrations of motor oil (<1.0 mg/L), VOCs (< 1.0 ug/L), and metals (low levels). Sludge and clarifier wastewater samples had no detections of semi-volatile organic carbons (SVOCs). The Discharger collected 19 soil samples from six boreholes around the leach field and one from a background location at a depth of 4 to 16 feet below grade surface. One of the 19 samples had a detection of motor oil at 15 milligrams per kilogram. The laboratory detected very low levels of acetone and 2-butanone in six of the soil samples but the Discharger attributed the detections to laboratory contamination. Metals detected in soil samples around the leach field were at levels less than two times the background soil sample.

COMPLIANCE HISTORY

The vehicle wash facility has no previous regulatory oversight and therefore historical compliance is not available. Based on assessment data presented in the Discussion section above, the vehicle wash facility has not had a significant impact to groundwater or surface waters near the vehicle wash facility.

POTENTIAL PROBLEMS

If the Discharger exceeds the design specifications of the existing leach field, there is potential for wastewater to daylight into the ephemeral creek immediately downgradient of the wash area. The proposed Monitoring and Reporting Program will require the Discharger to perform regular visual inspections of the creek bed and log any observed wet conditions along the banks of the creek. Another associated problem that could result from exceeding design specifications is the potential occurrence of heavy metals, motor oils, and VOCs entering the leach field. The Discharger has indicated it has implemented Best Management Practices (BMPs) which include:

- posting signs at the vehicle wash facility indicating no chemical usage on or near the carwash sump;
- use of only clear, plain water for vehicle washing;
- prohibiting the disposal of chemicals into the sump; and,
- prohibiting vehicle maintenance or associated degreasing activities.

ENVIRONMENTAL SUMMARY

The proposed waste discharge requirements are for an existing facility and their adoption is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, Section 21000, et. seq.) in accordance with Section 15301, Chapter 3, Title 14, of the California Code of Regulations (Existing Facilities Exemption).

COMMENTS AND RESPONSES

On July 29, 2008, Water Board staff notified the following parties of staff's recommendation to adopt WDR Order No. R3-2008-0062:

George Hill – BLM Hollister, **NO COMMENT**
Rick Cooper – BLM Hollister, **NO COMMENT**

Tim Moore – BLM Hollister, **NO COMMENT**

Bruce Myers – Central Valley Regional Water Quality Control Board, **NO COMMENT**

Bob Shingai – San Benito County Environmental Health Department, **NO COMMENT**

Lynn Suer – USEPA (SFD-7-2) Remedial Project Manager, **NO COMMENT**

Elizabeth Janes – USEPA Region 9 – Underground Injection Control Program

COMMENT: The system is listed on USEPA's inventory of injection wells as Class V industrial (5W20), subject to monitoring via state permit. That means that the injection is authorized to occur by rule, and a federal Underground Injection Control (UIC) permit will not be required at this time. If the state permit is not issued or is cancelled, then the federal UIC program needs to be notified. Use of shallow injection wells for the disposal of motor vehicle wastes in a manner that may endanger underground sources of drinking water is prohibited. EPA can notify BLM of this status at the time that WDRs are made final.

RESPONSE: Water Board staff will regulate this facility with the proposed waste discharge requirements. The Water Board will notify all interested parties if there is a change or termination of wastewater discharges at this facility.

Elizabeth Brown – Northrop Grumman Corporation, **NO COMMENT**

RECOMMENDATION

Adopt WDR Order No. R3-2008-0062.

ATTACHMENTS

1. WDR Order No. R3-2008-0062
2. MRP Order No. R3-2008-0062
3. Comment Letter

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File: BLM Vehicle Wash Facility