



<i>Environmental Guideline</i>	
<b>Cleaning/Washing Outdoor Areas and Structures</b>	
<i>Document Identification Number:</i>	CCD-301.03.19
<i>Version:</i>	3.0
<i>Revision Date:</i>	October 29, 2008
<i>Contact Person:</i>	Kurt Schlomberg (DEQ)
<i>Controlled Copy Location:</i>	Not applicable.

<b>Activity Description</b>			
<p>Routine maintenance and cleaning of outdoor pavement, structures, buildings, and facilities. This activity includes sweeping, scrubbing, power washing, etc. of building exteriors including roof tops, windows, and walls, parking lots and structures, concrete islands, signs, stairs and sidewalks, and other outdoor surfaces and structures. Any street maintenance activities are described in Street Maintenance Environmental Guideline.</p> <p>Discharges to the storm sewer system without a permit are prohibited by State regulation (Regulation 65). However, it is allowable for washwaters from power washing activities to migrate onto vegetated ground surfaces without having to obtain a permit (<a href="http://www.cdphe.state.co.us/wq/permitsunit/powerwash.pdf">www.cdphe.state.co.us/wq/permitsunit/powerwash.pdf</a>).</p> <p>Allowable (permitted) non-stormwater discharges under CDPHE Colorado Discharge Permit System (CDPS) industrial stormwater permits include the following:</p> <ul style="list-style-type: none"> <li>○ Discharges from emergency fire fighting activities</li> <li>○ Uncontaminated compressor condensate</li> <li>○ Irrigation drainage</li> <li>○ Lawn watering</li> <li>○ Air conditioner condensate</li> <li>○ Uncontaminated springs</li> <li>○ Foundation or footing drains where flows are not contaminated</li> </ul> <p>Runoff from emergency firefighting activities is also permitted by the City's CDPS Permit Number COS-000001 for discharge from the Municipal Separate Storm Sewer System (MS4) to State Waters (MS4 permit). There are also allowable non-stormwater discharges listed in the City's MS4 permit. The MS4 operator is not required to enforce against the following discharge sources (unless identified as pollutant sources) under the illicit discharge program; however, these discharge sources may require permits from CDPHE WQCD:</p> <table border="0" style="width: 100%;"> <tr> <td style="vertical-align: top;"> <ul style="list-style-type: none"> <li>○ landscape irrigation</li> <li>○ diverted stream flows</li> <li>○ rising ground waters</li> <li>○ uncontaminated ground water infiltration to separate storm sewers</li> <li>○ uncontaminated pumped ground water</li> <li>○ potable water sources</li> </ul> </td> <td style="vertical-align: top;"> <ul style="list-style-type: none"> <li>○ foundation drains</li> <li>○ air conditioning condensation</li> <li>○ irrigation water</li> <li>○ springs</li> <li>○ water from crawl space pumps</li> <li>○ footing drains</li> <li>○ lawn watering</li> </ul> </td> <td style="vertical-align: top;"> <ul style="list-style-type: none"> <li>○ individual residential car washing</li> <li>○ residential swimming pools and hot tubs</li> <li>○ individual residential street washing</li> <li>○ water-line flushing</li> <li>○ riparian habitats</li> <li>○ wetlands</li> </ul> </td> </tr> </table>	<ul style="list-style-type: none"> <li>○ landscape irrigation</li> <li>○ diverted stream flows</li> <li>○ rising ground waters</li> <li>○ uncontaminated ground water infiltration to separate storm sewers</li> <li>○ uncontaminated pumped ground water</li> <li>○ potable water sources</li> </ul>	<ul style="list-style-type: none"> <li>○ foundation drains</li> <li>○ air conditioning condensation</li> <li>○ irrigation water</li> <li>○ springs</li> <li>○ water from crawl space pumps</li> <li>○ footing drains</li> <li>○ lawn watering</li> </ul>	<ul style="list-style-type: none"> <li>○ individual residential car washing</li> <li>○ residential swimming pools and hot tubs</li> <li>○ individual residential street washing</li> <li>○ water-line flushing</li> <li>○ riparian habitats</li> <li>○ wetlands</li> </ul>
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**Potential Environmental Risks**

The following environmental concerns are associated with this activity:

- Release of contaminants in wash fluids to sewer, waterways or soils, such as:
  - Oil & Grease
  - Fuels
  - Detergents/Cleaners
  - Deicing materials
  - Sediments
  - Maintenance fluids
  - Animal droppings

Potential consequences from performing the activity incorrectly:

- Property damage, personal injury or long-term damage to the environment
- Regulatory non-compliance, Notices of Violation, and related [financial & non-financial] penalties

**Critical Operating Requirements**

**Responsible: Operator**

**A. General Requirements**

**Prohibited Activities**

- Washing spills of any kind into the stormwater system is prohibited.
- Disposal of solid waste materials into any drain is prohibited.

**General Considerations**

- Each operator, tenant, and/or vendor conducting outdoor maintenance and/or cleaning activities for the City and County of Denver is responsible for understanding the applicable regulations and managing their activities accordingly; this Environmental Guideline is meant as guidance only and does not supersede any regulations.
- Consolidate solid waste materials into appropriate containers (i.e., dumpsters, trash cans, tanks, drums, etc.).
  - Refer to environmental guideline General Waste Management for guidance on waste handling & disposal.
- For all cleaning/maintenance activities for outdoor areas and structures, the following options exist for disposal/discharge of the effluent under the following requirements/conditions:
  - If chemicals are used for outdoor washing or maintenance activities, MSDS must be available to users.
  - If environmentally friendly (contains no toxic or hazardous constituents), the effluent can be land applied onto grassy or unpaved areas at a rate that it will not cause erosion or discharge to the MS4. MS4 means the Municipal-owned Separate Storm Sewer System, and is defined as a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) designed or used for collecting or conveying stormwater. No CDPS permit is required for this approach.
  - Utilize BMPs such as drain covers, straw bales, etc. to protect the storm sewer system from discharges from washing activities.
  - Direct discharge to the stormwater sewer system through a MINDI permit (see Expected Records/Outputs section).
  - Ensure that offsite disposal is done in an appropriately permitted facility.
  - Conduct the work in an area and manner that will allow for complete evaporation of the wash water (zero discharge).
  - If cleaning an area with visible animal droppings/waste, take precautions to minimize the introduction of solids into the sewer through sweeping, berming, etc.

**Training Requirements**

- Washing spills of any kind into the stormwater system is prohibited.
- Disposal of solid waste materials into any drain is prohibited.

**Storage & Material Handling Requirements**

- Maintain legible labels and markings on all containers.
- Ensure that all containers are in good condition and not leaking.

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<b>Critical Operating Requirements (continued)</b>	<b>Responsible: Operator</b>
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<u>B. Planning Requirements</u>	
<p>B1. When using new chemicals, check the City’s environmental guideline CCD-301.3.29 Environmentally Preferable Purchasing to ensure the chemicals are approved for use.</p> <p>B2. When using new chemicals, Environmental Quality should be contacted immediately to determine permit coverage and any sampling and reporting requirements. Additional approval and/or permitting by CDPHE may be required depending on the scope of the activity and chemical usage.</p>	

<u>C. Critical Tasks</u>	<i>Responsible: Operator</i>
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<p>C1. Contact DEH Environmental Quality prior to conducting outdoor cleaning operations to ensure permit coverage for the proposed activity, that proper disposal will occur, and if collection of discharge data are required.</p>	
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<u>D. Emergency Response</u>	<i>Responsible: Operator</i>
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<p>D1. If a spill occurs, refer to Environmental Guideline Spill Response.</p> <ul style="list-style-type: none"> <li>• <b>Call 311 immediately (during normal business hours) or at 303-206-0001 after normal business hours for all spills.</b></li> </ul>	
<p>D2. Control spills to minimize property damage and eliminate imminent risk to human health and the environment.</p>	

<u>E. Inspection &amp; Maintenance Requirements</u>	<i>Responsible: Operator</i>
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<p>E1. Inspect pretreatment devices and sumps regularly and maintain as necessary.</p>	
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<b>Expected Records / Outputs</b>	
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<u>Record / Output</u>	<u>Instructions</u>
1. Disposal profile, manifests & shipping forms	<ul style="list-style-type: none"> <li>• A disposal profile may be required by the disposal facility prior to shipping.</li> <li>• Manifest forms can be obtained from the disposal facility.</li> <li>• All documents should be maintained on file by the Operator for at least three years.</li> </ul>
2. Evidence of training	<ul style="list-style-type: none"> <li>• While formal certifications are not necessary, some form of “proof of training” (such as sign-in logs and handouts) is expected &amp; should be maintained on file by the Operator.</li> </ul>
3. Discharge Monitoring Reports (DMRs)	<ul style="list-style-type: none"> <li>• DMRs are required for discharges regulated under the CDPHE Industrial Permitting program. DEH provides support services to accomplish discharge permitting, monitoring, and reporting.</li> </ul>

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## References

### Phone Numbers

- **311 (for Spill Reporting during normal business hours).....3-1-1**
- DEH DEQ Emergency Response (after normal business hours)..... (303) 206-0001

### Guidance Materials (list is not limited to the following)

- Individual facility Municipal Facility Runoff Control Plans
- CDPHE Power Washing Guidance

### Training Materials (list is not limited to the following)

- CCD-302.04 Hazardous Waste Generator and Stormwater Training

### Related Environmental Guidelines (list is not limited to the following)

- CCD-301.03.26 Spill Response
- CCD-301.03.10 General Regulated Waste Management
- CCD-301.03.27 Surface Water

### Applicable Rules and Regulations (list is not limited to the following)

#### Federal:

- 40 CFR 110.3 Discharge of Oil
- 40 CFR 112 Oil Pollution Prevention (SPCC Plans)
- 40 CFR 117.3 Determination of Reportable Quantities for a Hazardous Substance
- 40 CFR 122-124 NPDES Regulations for Storm Water Discharges
- 40 CFR 401 Effluent Limitation Guidelines

#### State:

- CDPHE Regulation 65
- CDPHE Regulation 61
- Colorado Water Quality Control Act
- CDPHE Colorado Discharge Permit System (CDPS) Permit Number COS-000001

#### Local:

- Metro Wastewater Reclamation District Rules and Regulations
- [CCD Revised Municipal Code](#)
  - Sec. 56-102. (a) Polluted water prohibited in storm sewers and watercourses
- [DPW Rules and Regulations Governing Sewerage Charge and Fees and Management of Wastewater](#)
  - Sec. 7.01. Prohibited Discharges to the Storm Sewer System