

CONNECTICUT MARINE TRADES ASSOCIATION

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Grant W. Westerson, *Executive Director*

MEMO

Date: **04/09/07**

To: **CMTA Membership**

Re: **Pressure Washing Wastewater**

As everyone should now be well aware, last May the Connecticut Department of Environmental Protection decreed that pressure washing wastewater from the washing of boat bottoms can no longer be discharged to the ground as described in the 2002 Clean Marina Guidebook. The deadline for complying with this decree is December 2008, which will be here before you know it.

Many of you are actively involved in determining your best solution for handling this water and both CMTA and the New England Marine Trades Association (NEMTA) have formed Task Forces to assist our members in evaluating the options. An update on these efforts, including our evaluation of various treatment systems, will be available in about a month.

In the mean time, CMTA, as a member service, has implemented a sampling program to provide you with some meaningful data about what is normally found in this wastewater so you can further evaluate your options for treatment and disposal. We believe the information will be helpful in obtaining accurate pricing for disposal of this water by a licensed hauler, should you wish to implement an off-site disposal option. We also believe that this information will be helpful to vendors of treatment and or recycling equipment, should you decide to pursue one of those options.

The data on the attached table, reverse of this page, was generated from pressure washing wastewater collected from six Connecticut marinas. The waste was collected in a pan placed under the keel of boats while they were washed. One quart of the water was then collected from the pan and placed in a 15 gallon drum. In most cases the drums were filled and, therefore, represent approximately 60 boats per sample. We believe that the range of data on the attached table will represent the wastewater generated by most marinas in the State.

As you can see, none of the wastewaters came close to being a hazardous waste under Connecticut and federal regulations, but it is contaminated and requires proper disposal, treatment before reuse, or pre-treatment before being discharged to a sanitary sewer under the DEP's General Permit for Miscellaneous Sewer Compatible Wastewaters.

We hope that this information is helpful in assisting you in evaluating your options for the management of your pressure washing wastewater and urge you to focus on this issue. December 2008 isn't that far away.

Boat Bottom Wash Water Analytical Results

Parameter	RCRA Regulatory Limit	Wash Water 1	Wash Water 2	Wash Water 3	Wash Water 4	Wash Water 5	Wash Water 6
Aluminum	NE	2.480	1.150	2.840	0.894	1.890	7.820
Antimony	NE	ND	ND	ND	ND	ND	ND
Arsenic	5.00	ND	ND	ND	ND	ND	ND
Barium	100.00	0.0908	0.3300	0.8300	0.1730	0.0785	0.9510
Beryllium	NE	ND	ND	ND	ND	ND	ND
Cadmium	1.00	0.0115	ND	ND	ND	ND	ND
Calcium	NE	40.90	9.01	11.90	32.10	49.80	60.70
Chromium	5.00	0.0276	ND	0.0363	ND	ND	0.0572
Cobalt	NE	0.0124	ND	ND	ND	ND	ND
Copper	NE	29.60	7.67	31.40	10.30	7.74	56.50
Iron	NE	37.40	12.10	38.00	20.40	37.20	71.40
Lead	5.00	0.0884	0.1350	0.1010	0.2700	0.0849	0.7510
Magnesium	NE	81.40	1.83	3.03	67.20	80.50	108.00
Manganese	NE	0.986	0.755	0.754	0.351	0.357	0.913
Mercury	0.20	ND	ND	ND	ND	ND	0.00019
Nickel	NE	0.0483	0.0105	0.0153	0.0082	0.0248	0.0642
Potassium	NE	38.50	ND	1.92	27.90	50.70	46.60
Selenium	1.00	ND	ND	ND	ND	ND	ND
Silver	5.00	ND	ND	ND	ND	0.0076	ND
Sodium	NE	601.00	10.30	5.46	537.00	641.00	792.00
Thallium	NE	ND	ND	ND	ND	ND	ND
Vanadium	NE	0.0204	ND	0.0142	ND	0.0120	0.0364
Zinc	NE	32.80	8.22	22.60	27.50	18.10	204.00

Notes:

All results in milligrams per liter (mg/l)

ND = Not Detected

NE = Not established