



James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
A. Preston Howard, Jr., P.E., Director

March 20, 1996

R.W. Underwood
Consolidated Cleaning Company
P.O. Box 458
Stedman, North Carolina 28391

SUBJECT: Mobile Cleaning Operations
Permitting Requirements

Dear Mr. Underwood:

As you requested, this letter is being sent in response to our telephone conversations and meeting on February 15, 1996. In these conversations, we have discussed the regulatory requirements associated with your mobile cleaning operations. My understanding of your operations is that you provide an on-site cleaning service to your clients. This service consists of pressure washing of vehicles with non-heated water and biodegradable detergents. I further understand that the following management practices are being employed at each site:

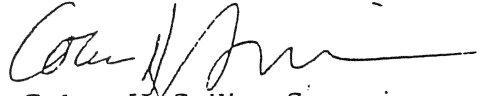
- Where feasible, the cleaning operations are undertaken on grassed or graveled areas, to prevent discharges to surface waters or storm drainage collection systems.
- Where cleaning operations can not be performed as described above and when operations are performed in the vicinity of a storm drainage collection system, the drain is covered with a portable drain cover (see attached illustration). Sorbent booms such as "Petrosorb" or "Vacu-boom" are also used to prevent the wash water from discharging directly to surface waters and/or storm drains and to remove oils, grease and foam from the wash water. Any excess ponded water is removed and properly handled (ex: discharged to sanitary sewer collection system with permission from the system's owner) prior to removing the drain cover.
- The detergent being used is biodegradable and the pH has been adjusted to be in the range of 6-9 standard units.
- No steam cleaning, engine or parts cleaning is being conducted.
- Notification is made to the city and/or county within which the cleaning service is being provided.

As described by you, if the above management practices are instituted, only incidental amounts of water may be released and only after having been filtered through absorbent materials. My evaluation of the materials used and the demonstration you provided, and my understanding of your implementation practices, leads me to the conclusion that the cleaning operations are being performed in a manner which would have a de minimus effect on water quality. Therefore, any vehicle cleaning operations conducted using the above management practices shall not require a wastewater disposal permit.

Please be advised that if it is determined that any cleaning operation performed by your company causes or contributes to a water quality standard violation, you will be held liable for those actions and subject to the penalties outlined under the North Carolina General Statutes 143-215.6A, 215.6B and 215.6C.

If you have any questions or would like further clarification, please contact me at 919/733-5083, extension 550.

Sincerely,



Coleen H. Sullins, Supervisor
Permits & Engineering Unit

cc: Regional Water Quality Supervisors
Permits & Engineering Unit