



North Carolina Department of Environment and Natural Resources

Division of Water Quality

Beverly Eaves Perdue
Governor

Coleen H. Sullins
Director

Dee Freeman
Secretary

April 30, 2010

Dear Marina/Boatyard Owner:

In December 2004, the North Carolina Environmental Management Commission, Coastal Resources Commission, and Marine Fisheries Commission adopted the North Carolina Coastal Habitat Protection Plan (CHPP). As a part of the CHPP, reducing sources of pollution that may result in degradation of water quality and/or aquatic habitat is a high priority for the North Carolina Division of Water Quality (DWQ) as well as other agencies.

Accordingly, DWQ conducted a comprehensive study of a number of industrial activities and services offered by facilities within the marina industry; specifically, the study focused on pressure washing and hand washing activities. Results of this study show significant levels of metals in waste streams from these pressure-washing and hand-washing activities. National studies have shown similar results. In addition, these other studies show these types of chemicals from pressure-washing and hand-washing to negatively impact benthic organisms from the bioaccumulation of metals in their natural habitat. The wash water generated by industrial activities is defined as a processed wastewater. DWQ is encouraging all North Carolina marinas and boatyards to take the steps that are necessary to ensure that your facility is taking a proactive approach to help reduce the water quality impacts resulting from the chemical constituents found in this processed wastewater.

We recognize that some marinas and boatyards have taken proactive measures to minimize the impact from these activities on water quality. Some of these measures include collection and containment devices, closed-loop recycle systems, and other Best Management Practices (BMPs). However, there are many facilities within our marina industry where BMPs have not been pursued or implemented.

Stormwater Management of Industrial Activities

Stormwater runoff is regulated by the Environmental Protection Agency (EPA) through the National Pollutant Discharge Elimination System (NPDES) permit program. Coverage under the NCG190000 is applicable to all owners or operators of stormwater point source discharges associated with activities classified as establishments primarily engaged in operating **Marinas** [standard industrial classification (SIC) **4493**] **that provide vehicle maintenance activities, and Ship and Boat Building and Repairing** [SIC **373**]; and like activities deemed by DWQ to be similar in the process and/or the exposure of raw materials, products, by-products, or waste materials. Examples of vehicle (also known as vessel) maintenance activities are listed below:

- pressure washing
- sanding
- commercial hand washing
- sand blasting
- painting and paint removal
- boat building and repair

Wastewater Management

As previously mentioned, the wash water created from pressure-washing and hand washing is defined as a processed wastewater. Therefore, the NPDES Stormwater NCG190000 permit does not cover or authorize this wastewater to discharge to surface water. A separate NPDES wastewater permit may be

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required for any wastewater discharges at your facility. For more information on wastewater permits, please visit the following website: <http://portal.ncdenr.org/web/wq/swp/ps/npdes>.

Best Management Practices (BMPs)

To avoid prohibited discharges of wastewater to surface waters and contaminated stormwater runoff into surface waters, DWQ recommends many BMP options. **Note: Some structural BMPs may require an engineer or consultant as well as the proper permits from Aquifer Protection. Before installing any structural BMPs at your facility, please contact your DWQ Regional Office for guidance.**

- Conduct your activity under a roof so that the wastes aren't exposed to stormwater.
- Install a collection system around boat wash areas to collect the processed wastewater and debris
- Convert from a liquid operation to a dry operation for hull maintenance and cleaning operations to allow for easier clean-up and collection of pollutants for proper disposal, thus minimizing contaminated stormwater runoff
- Use or rent vacuum sanders for boat maintenance activities
- Design hull maintenance areas over dry land as far away from the water as possible and designate those areas with signs – use of specific berms can be installed to direct water away from surface waters
- Discharge the wastewater into a local sewer system (this option requires approval from the Waste Water Treatment Plant and may require pretreatment of waste prior to approval)
- Pump & Haul of waste material by an authorized industrial waste handler
- Good housekeeping measures – sweep wash pads and tarps free of debris, collect & dispose of debris in labeled containers, remove tarps if possible and store till next use, discard worn tarps with holes, etc.

The Wetlands & Stormwater Branch within DWQ, created the following website especially for our state's marina industry. This website assists our marinas with technical guidance information on stormwater and wastewater, direct links to permit information, BMP Manuals, and specific contacts to address questions and concerns about pressure-washing and hand washing at your facility: (<http://portal.ncdenr.org/web/wq/swp/ws/cu/marinas>)

*Please check this website for monthly updates from DWQ.

DWQ understands and respects the value of our marina industry. We commend and will recognize those who are striving to protect our waterways from water quality degradation. DWQ's mission is to preserve, protect and enhance North Carolina's water resources and we will continue to provide assistance to our marina industry in carrying out this mission. It is very important for all of us to be proactive in preserving one of our most precious commodities. With the help from DWQ and other cooperating agencies, the Clean Marina Program, private and public entities, as well as your facility, we can ensure that we are doing the best we can to protect our waters.

If you have installed or are practicing any BMPs at your facility, related to the concerns in this letter, that you would like us to know about, please call any of the following DWQ locations: Wilmington Regional Office at (910) 796-7215, Washington Regional Office at (252) 946-6481, Central Office at (919) 807-6371, or myself at (919) 807-6377. We would like to acknowledge your efforts. In addition, please visit the NC Clean Marina Program at <http://dcm2.enr.state.nc.us/Marinas/marinas.htm> on how you may be able to apply! Thank you for your cooperation on this matter.

Sincerely,



John Hennessy
Division of Water Quality,
Wetlands & Stormwater Branch