





GPP 13: Vehicle washing and cleaning

These guidelines are produced by Natural Resources Wales, the Northern Ireland Environment Agency, the Scottish Environment Protection Agency. Contact details are available at the end of this document.

Guidance for Pollution Prevention (GPPs) are based on relevant legislation and reflect current good practice. Following these notes will help you manage your environmental responsibilities to prevent pollution and comply with the law. If you cause pollution or allow it to occur, you may be committing a criminal offence.

For Northern Ireland, Scotland and Wales, this document provides guidance on environmental legislation. These guidelines are not endorsed by the Environment Agency. For guidance on environmental regulations in England go to www.gov.uk

To find the relevant regulations visit www.legislation.gov.uk

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1. Introduction

This guidance is for businesses that wash vehicles, and for anyone who washes vehicles as part of a business activity. It does not apply to householders washing their own cars.

Effluent and run-off from vehicle washing and cleaning activities can damage the environment and pollute rivers, streams, burns and groundwater. Dirt, brake dust, traffic film residue and oil that is washed off are all pollutants.

The cleaning agents you use (including those labelled biodegradable or traffic film removers) are very poisonous to river life. If you cause pollution, you are breaking the law and spoiling your environment.

Dirty water or run-off from vehicle washing and cleaning carried out as a business or industrial activity is called trade effluent. Whether you're cleaning just one vehicle or responsible for a large lorry fleet, you must arrange for collection and disposal of effluent to prevent pollution. It's illegal to discharge trade effluent to the environment or into drains without permission.

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2. Good practice summary

- Keep a site drainage plan know where surface water drains are and where to connect to the foul sewer.
- Colour code your drains, blue for surface water and red for the foul sewer.
- Have an oil separator installed where runoff is contaminated with oils or fuels, such as servicing and refuelling areas.
- Make sure washwater from vehicle cleaning doesn't enter the oil separator (it will stop it working)
- If possible, drain washwater from vehicles to the foul sewer and get a trade effluent consent from your sewer provider.
- If there is no foul sewer, collect washwater for disposal offsite by a waste company. Alternatively use cleaning methods that don't produce any liquid waste.
- Cover your wash areas to reduce the volume of wastewater you produce and need to deal with.
- Manage all your waste according to your duty of care eg empty containers, oily rags or used cleaning cloths.
- Don't let washwater from vehicles enter the surface water drains.
- Don't let washwater from vehicles enter an oil separator (it will stop it working)
- Never wash vehicles on unmade ground.
- Don't wash vehicles where runoff can drain into surface water drains or SUDS, for example in car parks.
- Never discharge washwater to a foul sewer without contacting your sewer provider to get a trade effluent consent.
- Don't use pressure washers, unless you have a designated washbay.

3. Site drainage

3.1 Keep a site drainage plan

You should keep an accurate site drainage plan. A drainage plan should clearly show the foul sewers, any combined drainage systems and any surface water drains. Your plan should show where all drainage discharges to. You should also show silt traps, oil separators and any other drainage infrastructure incorporated into the drainage network.

3.2 Keep detergents away from oil separators

All garages where maintenance and repairs are carried out should have an oil separator installed on the surface water drainage system. This will capture oils and fuels from maintenance and refuelling areas. The runoff from a car washbay must not be discharged through the oil separator, as this will prevent it working properly. Make sure water with detergents does not drain to your oil separator. You need to inspect the oil separator regularly, clean it when necessary and keep a log of inspections and cleaning. You can find information on oil separators in Reference 1 - GPP3 Installation and Maintenance of Oil Separators

3.3 Colour code your drains

Surface water drains, gullies and manhole covers should be colour coded, using blue for surface water and red for the foul sewer (or combined sewer).

Clean uncontaminated runoff from roofs should go directly to surface water drains, if possible downstream of the oil separator. Roof water downpipes should connect directly to the surface water system using sealed top, side entry gullies or direct drain points. Avoiding the use of open grates will help you prevent contaminated water entering the surface water drains. Consider putting a roof over your washbays to reduce the amount of effluent draining to the foul sewer.

3.4 Contaminated water and trade effluent consents

All contaminated water, used for cleaning, from washbasins and from compressors should be disposed of to the foul sewer. Avoid any possibility of them being connected to roof water downpipes or disposed of to surface water drains. See section 3.3 above.

You will need to have a trade effluent consent from your sewer provider. This will give details of what can be discharged to the foul sewer. Wherever this guideline

mentions disposing of liquid waste to sewer, you must have obtained this consent. See Reference 2 - Water and sewerage providers

3.5 If no foul sewer is available

If you can't recycle water or connect to a suitable public foul sewer, you'll have to consider these options:

- carry out washing and cleaning activities on another site that does have proper facilities
- collect all the effluent in a sealed system for off-site removal as a liquid waste. You will have to comply with waste management licencing or environmental permitting regulations.
- install your own trade effluent treatment system. The system must be designed, manufactured and installed to treat washing effluent to a good enough quality to discharge to the environment (to land or watercourse) or to a private surface water sewer. You need permission from your environmental regulator (a consent or authorisation) for this and an annual charge is payable. Permission is not given automatically, so you must talk to your environmental regulator before you buy any equipment or make any connection or discharge. If consent is given, it will usually require the use of biodegradable detergents. In Northern Ireland, consent to discharge for this type of activity will not normally be granted. Contact details for the environmental regulators are at the end of this guidance.

3.6 Pollution Incident Response Plan

You should have a pollution incident response plan in place. Reference 3: GPP21-Pollution Incident Response Planning provides information on how to identify pollution risks and the need to train staff in how to deal with a spill or other incident on site.

You should keep a spill kit with suitable materials close to where a risk of pollution exists. Make sure the absorbent materials are appropriate for the liquids other substances that could be spilled, such as detergents or other cleaning chemicals.

3.7 Vehicle maintenance areas and body shops

Areas used for vehicle maintenance will collect drips and minor spills from a number of sources. These areas must have an impermeable surface, preferably with a raised

edge. Spills should be mopped up with absorbents if possible to reduce the contamination of any runoff. Oil soaked rags or absorbents must be disposed of as hazardous/special waste.

These areas must be drained either to the foul sewer, with a trade effluent consent in place, or to a sealed sump. If drained to the foul sewer you should have an oil separator in place to prevent oils and fuel entering the sewer. **Never allow detergents from car washing or other cleaning activities to enter an oil separator**, this will prevent the oil separator from working effectively.

If you have a workshop pit that collects water, and have a gully and pump, then this should also be connected via an oil separator to the foul sewer or into a sealed sump. See Reference 6: GPP 19 Vehicle servicing and repairs

4. Duty of Care for waste

You must comply with the requirements of the Duty of Care Regulations. You have a legal responsibility to ensure that you produce, store, transport and dispose of controlled waste without harming the environment.

This involves:

- Accurately describing your waste, including any hazardous properties
- Safe and secure storage of waste
- Segregation of recyclable waste where required
- Segregation of hazardous/special waste, such as oily rags and absorbents
- The use of a registered waste carrier to remove waste from your site see Reference 9 for how to search your relevant Environmental Regulator's public register. You should also know where the carrier takes your waste for onward management.
- The use of waste transfer notes or consignment notes (for hazardous special waste)

 Keeping records – you must keep copies of Waste Transfer Notes for a minimum of two years and Hazardous Waste Consignment Notes for a minimum of three years

In Scotland and Northern Ireland you must segregate key recylates for separate collection. Key recyclates are plastics, metal, glass, paper and card/cardboard.

See Reference 4 - Duty of Care: Codes of Practice

5. Chemical storage

Chemicals such as paints, detergents, degreasers and solvents should be stored in an area that is:

- secure avoid sites close to a boundary fence
- away from where vehicles move around to minimise the risk of collision or damage to storage systems
- clearly signposted, with a clear boundary, for example a kerb.

Secure bunded storage cabinets should be used. They are available in a variety of sizes, according to the capacity required. Particular care should be taken to ensure that containers and bunds are resistant to attack from the stored substance.

Storage vessels should be labelled to show their contents and should be kept as close to the point of use and as far from surface water drains as possible.

Keep a drainage plan of your site and ensure that storage areas have no surface water drains. Keep spill kits close to your storage areas with absorbent materials that are appropriate to the materials stored. Make sure your staff know how to use them.

6. What sort of car washing do you do?

Washing and cleaning your own business vehicles and plant on your own premises?

What do you need to wash or clean, and where? If you use a vehicle cleaning business or contractor to work on your site, it's your responsibility to provide appropriate facilities such as those detailed in section 7. Using a nearby commercial wash facility, or washing equipment that re-uses water might be more cost effective.

Allowing washing and cleaning to be carried out for commercial gain by someone else on land or premises that you own?

Are you giving clear instructions about where and how the washing and cleaning is to be carried out and how solid and liquid waste should be dealt with? Have you provided appropriate facilities? As a landowner or landlord, you are responsible for:

- trade effluent and surface water discharges
- pollution caused by site contractors, service providers and tenants.

Provide advice and guidance on good environmental practices and make sure that site operators follow them; see section 7. If you allow washing and cleaning to take place in an unsuitable area, you might be prosecuted for any pollution caused.

Washing and cleaning vehicles as your business?

Where and how will you carry out your business? If you offer an on-site vehicle washing and cleaning service (including franchises), you must use a designated washing area that has proper drainage arrangements if run-off is produced from your activities; see section 7.1.

If there isn't a designated area, your activities might cause pollution and you will be responsible even if you don't own the site.

If your business involves washing cars by hand see section 7.6.

What solid wastes will you produce and what arrangements have you made for its correct disposal? See section 4.

7. Requirements for all vehicle washing and cleaning activities

Activities that produce run-off from the vehicle onto the ground and use cleaning and valeting products should be carried out in areas that are clearly marked and isolated from surface water drainage systems, unmade ground and porous surfaces. These areas are called designated washing bays.

7.1 Designated washing bays

A designated washing bay should be designed so that run-off is:

- minimised, by putting a roof over it if possible
- isolated using channels, gullies, gradient (fall on the surface) and kerbs
- directed to a silt trap or settlement tank to remove larger particles of silt and sediment
- either collected in a sealed system for reuse, discharged to the public foul sewer with prior permission of the local sewer provider or collected in a sealed system for authorised disposal
- never discharged to the sewer through an oil interceptor. Detergents will
 prevent the oil interceptor from working properly.

You should also:

- have procedures for everyone, including contractors, that cover where and how vehicle washing and cleaning should be carried out and what to do in a spillage emergency
- provide notices for designated washing bays saying what they're for and that washing and cleaning should only be carried out in the bay
- consider whether a fence or barrier is required to prevent spray or wind drift out of the designated area
- minimise water use and solid waste production with appropriate equipment and procedures.

7.2 Reduce volume of water

You should consider ways to reduce the volume of water you use for washing and cleaning, and the amount of liquid and solid waste you produce. Recycling effluent and reusing the water is the best environmental option for dealing with vehicle washing and cleaning effluent.

Use washing equipment that has a collection and re-use or recirculation process. These systems usually require regular, off-site removal of some water, silt or sludge so waste management licensing legislation will apply.

A waste minimisation review will help you save money on raw materials and waste disposal costs. Free, independent and practical advice on how to minimise waste is available from Wrap, WRAP NI, Resource Efficient Scotland and Resource Efficient Wales. See Reference 5: Business efficiency support

7.3 Connecting to a foul sewer and obtaining consent

If recycling and reuse isn't possible, discharging all the vehicle washing and cleaning effluent to a public foul sewer is generally the next best environmental option. The effluent flows to a purpose-built and closely monitored sewage treatment plant.

You need permission from your local sewer provider to discharge vehicle washing and cleaning effluent to a public foul sewer. Permission (a consent or agreement) isn't given automatically so you must talk to your sewer provider before you make any connection or discharge. If you don't have their consent, you're breaking the law. See Reference 2 to find your local sewer provider.

You're likely to pay for this discharge; the amount depends on volume and chemical composition. You should give your local sewer provider an accurate site drainage plan to support your proposals. You might have to cover your designated washing bay to prevent clean rainwater adding to the volume of effluent. Your sewer provider might make it a condition of your consent that only certain types of detergent, for example biodegradable, will be used and discharged into the sewer. Never allow any detergents to enter an oil separator as this can stop it working properly.

7.4 If no foul sewer is available

If you can't recycle water or connect to a suitable public foul sewer, you'll have to consider these options:

- carry out washing and cleaning activities on another site that does have proper facilities
- collect all the effluent in a sealed system for off-site removal as a liquid waste.
 Waste management licensing legislation will apply.
- If you can't recycle water or connect to a suitable public foul sewer please consider the options as set out in 3.5 above. However, in Northern Ireland consent to discharge for this type of activity will not normally be granted. Contact details for NRW, EA, NIEA and SEPA are at the end of this guidance.

7.5 High pressure washers and steam cleaners

High pressure washers (including jet washers) and steam cleaners are effective at removing dirt, grease and coatings from vehicles, machinery and surfaces. But they use large volumes of water (500 - 7,200 litres an hour), often at high temperatures and containing cleaning chemicals. However, they may use less water than a simple hose.

If you are cleaning vehicles and plant with a high pressure washer (jet wash) or steam cleaner, you must use a designated washing bay.

If you use a pressure washer to clean roads, yard surfaces, other equipment or in areas where the drainage isn't collected or connected to the foul sewer, you must stop run-off from entering surface water drains. See section 3 for good practice advice for dealing with this runoff.

Never allow run-off containing cleaning chemicals, detergents or emulsifiers to enter surface water drains as this will cause pollution and prevent oil separators from working properly. For more information see Reference 1: GPP3 Installation and Maintenance of Oil Separators.

7.6 Washing by hand

If you wash, clean or valet vehicles by hand, or are responsible for a site where this service is offered, you must have good site management procedures and practices in place to avoid pollution. You should use designated wash bays as detailed in section 7.1, or make sure that you have other satisfactory arrangements in place.

However, it may be acceptable to clean or valet private cars by hand in areas such as car parks, without designated wash bays (roving activities), if:

- only clean water is used and no detergents or cleaning chemicals
- or your working method doesn't produce any runoff from the vehicle
- or the runoff from the vehicle is contained, collected or treated in some way and dealt with or disposed of legally
- and you can show us that the proposed activity will not adversely affect separators and SUDS, or damage the environment at any time.

In Scotland, General Binding Rules (GBRs) prohibit the discharge of trade effluent and detergents to surface water drains.

Your environmental regulator (or the sewer provider) may not allow roving hand car washing (as described above) to take place because of the environmental sensitivity of the site or other factors which makes the activity likely to cause environmental harm.

You are advised to contact your environmental regulator (contact details in section 12) before you set up or start a roving washing operation to find out if your proposals are acceptable from an environmental protection point of view.

If we do agree to roving activities (as described above), you must also have:

- clear, well understood procedures
- good working practices
- close management control at all times

and:

• use the minimum amount of water

- never use hoses or high pressure washers
- don't carry out roving activities where dirty water or other runoff could enter or be washed by rain into surface water drains
- make sure that buckets and containers of dirty water/effluent are emptied into clearly marked and agreed points connected to the foul sewer. This water is also a trade effluent and you need permission from the local sewer provider to dispose to a public foul sewer. See Reference 2: Water and Sewerage providers.

and, where you are producing no noticeable runoff from the vehicle or collecting it in some way:

- apply the minimum amount of cleaning product and ensure no spray drift
- use cleaning and valeting chemicals diluted to appropriate working strengths; never use undiluted concentrates
- don't use products that are unsuitable for hand washing, e.g. commercial traffic film remover
- Please note washing very dirty vehicles, commercial vehicles or engine compartments by hand must only be carried out in designated wash bays.

7.7 Automatic cleaning systems

These systems use a variety of techniques but generally involve the use of water jets and rotating brushes, and they often have a drying facility.

It's possible to get systems which filter, re-circulate and re-use most of the water but they still require a connection to the foul sewer for overflow and filter backwash water. As with all discharges to the public foul sewer, this is regarded as a trade effluent and its disposal requires permission from the local sewer provider. If no foul sewer is available, you'll have to consider the options in section 3.5. Waste management legislation applies to the disposal of solid trade waste, silt and sump sludge from these systems. See section 4.

7.8 Cleaning platforms

In this system, a vehicle is driven onto a mobile or static cleaning platform, which has an integral containment sump for holding wash water. Cleaning chemicals are sprayed or applied by hand onto the vehicle, which is then sponged and wiped dry.

The wash water is either discharged to a foul drain or settled and passed through a series of filters and tanks where it's cleaned and then circulated for re-use.

When using this system, you must contain wash water and cleaning chemicals to prevent them entering surface water drains. Waste management legislation applies to the disposal of solid trade waste, silt and sump sludge. See section 4.

7.9 Vehicle cleaning with no water

Technologies for hand washing that don't use water on site have been developed. Vehicles are sprayed with a product which cleans the surface and applies a polish in one application. Towels and micro-fibre materials are used to remove dirt and polish the vehicle. Used towelling is machine washed off site.

If no liquid effluent or application spray drift is produced, this method is unlikely to cause water pollution on site. The cleaning agent must be used as intended and stored safely. You must follow the requirements for general hand washing in section 7.6 where appropriate, and consider how you will prevent spray drift from landing on hard surfaces draining to surface water drains.

Waste management legislation applies to the storage and disposal of solid trade waste, such as used polishing cloths and empty containers. See section 4.

You must follow the manufacturer's recommendations for handling and using these products including the need to use appropriate personal protective equipment.

8. Vehicle dewaxing

The dewaxing and degreasing of vehicles and components must be carried out in a designated washbay and not on unmade ground or in areas which discharge to surface water drains, watercourses or soakaway. A wash water recycling system will reduce water use and associated costs.

The washbay should be impermeable and isolated from the surrounding area by a raised kerb or roll-over bund, with the effluent directed to foul sewer.

If there is no foul sewer available, then drain the effluent to a sealed sump. Effluent from high pressure water and steam cleaners can cause problems and these should only be used in designated washbays.

NB. You should take particular care when using hydrocarbons such as paraffin and white spirit as degreasers, as these substances are toxic to river life. In no circumstances should these substances be discharged to surface water drains. Disposal to foul sewer may also be unacceptable and you must contact the sewerage provider. Never allow wash water containing detergents to enter an oil interceptor as this will stop it working properly.

9. Cleaning yards and forecourts

Have a site drainage plan – see section 3

Never use degreasers or steam cleaners to clean such areas unless the area drains to foul sewer. For areas that drain to surface water there are two options:

 Any liquid is soaked up using absorbent material which should be safely disposed of off-site. Sealing of gullies may be appropriate to prevent liquid or absorbent entering the drainage system.

or

ii. Fit a valve at the oil separator outlet to close it off during the cleaning operation and remove all accumulated washings for disposal off-site.Install an alarm to indicate that the closure valve is in the shut position.

10. Glossary

Biodegradable – can be broken down by natural processes

Clean water drain – a drain that connects to surface water, such as rivers, ditches etc.

Designated wash bays – an impermeable area without any surface water drains

Duty of care – your responsibilities for waste

Foul drain – connects to a public foul sewer

Foul sewer – takes contaminated water via a public sewer to a waste water treatment plant

Groundwater – all the water held below ground level in soils and rocks

Hazardous/special waste – waste with hazardous properties

High pressure washers – washers that spray water (and cleaners) at a high pressure

Oil separator – a device designed to prevent oil in a site's runoff from entering surface water drains

PIRP - Pollution Incident Response Plan

Public sewer – either a foul sewer or combined sewer (both sewage and surface water) that takes wastewater to a treatment plant

Runoff – the channelled rainwater that runs off roofs and made up surfaces

Sewer – Foul sewer that connects to waste water treatment plant

Spill response plan – PIRP – Pollution Incident Response Plan – a statement of how to deal with a spill to prevent pollution

Steam cleaners - blast steam at dirt. Often used to clean engines and other machinery

SUDS or SuDS – Sustainable (Urban) Drainage Systems – convey and contain runoff usually above ground without pipes. Treat light contamination and reduce flood risk.

Sump – a storage tank for liquids

Surface water drain – connects directly to the water environment - rivers, burns, streams ditches, groundwater etc.

Trade effluent – any liquid waste produced by your business

Trade effluent consent – permission to discharge liquid waste into a sewer

Wash bays – Impermeable areas with no connection to surface water drains, which contain the runoff from washing activities

Waste carrier – someone licenced to collect your waste.

11. References

Reference 1: GPP 03 Installation and Maintenance of Oil Separators

http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/

Reference 2: Water and sewerage providers

Water UK: Find your supplier http://www.water.org.uk/consumers/find-your-supplier

Scotland on Tap http://www.scotlandontap.gov.uk/suppliers/suppliers

Reference 3: GPP 21 Pollution Incident Response Plans

http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/

Reference 4: Duty of Care – Codes of Practice

Duty of Care: A code of practice – Wales

http://gov.wales/topics/environmentcountryside/epq/waste_recycling/ publication/waste-duty-of-care-code-of-practice/?lang=en

Duty of Care: A code of practice – Northern Ireland https://www.daera-ni.gov.uk/publications/waste-management-duty-care-code-practice

Duty of Care: A code of practice – Scotland

http://www.gov.scot/resource/0040/00404095.pdf

Duty of Care: A code of practice England

https://www.gov.uk/government/publications/waste-duty-of-care-codeof-practice

Reference 5: Business Efficiency Support

WRAP Northern Ireland: http://www.wrapni.org.uk/

Resource Efficient Scotland http://www.resourceefficientscotland.com/

Resource Efficient Wales: http://resourceefficient.gov.wales/?lang=en

WRAP England: http://www.wrap.org.uk/category/subject/resource-efficiency-0

Reference 6: GPP 19: Vehicle Servicing and Repairs

http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/

Reference 7: Northern Ireland Planning – Standing Advice 25

http://www.planningni.gov.uk/index/advice/northern ireland environm ent agency guidance/standing advice.htm

Reference 8: Public registers of licenced waste sites

Northern Ireland – DAERA – Public register of licensed waste sites. https://www.daera-ni.gov.uk/topics/waste/public-registers

Scotland – SEPA – Waste sites and capacity.

https://www.sepa.org.uk/environment/waste/waste-data/waste-data-reporting/waste-site-information/waste-sites-and-capacity-excel/

Natural Resources Wales' Public Register:

http://naturalresources.wales/permits-and-permissions/check-for-a-permit-licence-or-exemption/?lang=en

England – Environment Agency – Search public registers.

http://epr.environment-

agency.gov.uk/ePRInternet/SearchRegisters.aspx

Reference 9: Public register of licensed waste carriers

Northern Ireland - <u>NIEA: Registered carriers / transporters database</u> <u>https://www.daera-ni.gov.uk/articles/registered-waste-carriers-transporters</u>

Scotland - <u>SEPA: Registered waste carriers and brokers</u> http://apps.sepa.org.uk/rocas/

Wales - <u>Wales: Registered Waste Carriers</u>
https://www.wastecarriersregistration.naturalresourceswales.gov.uk/en/registrations/search

England - England: Registered Waste Carriers

https://www.gov.uk/guidance/access-the-public-register-forenvironmental-information

12. Contact details

England and Northern Ireland and Scotland: Incident/Pollution hotline: 0800 80 70 60 (24 hrs)

Wales: Emergency hotline: 0300 065 3000, (press 1 - 24-hour

service)

Floodline - England, Wales and Scotland: 0845 988 1188

Flooding incident line (NI): 0300 2000 100

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Scottish Environment Protection Agency

www.sepa.org.uk

Strathallan House

The Castle Business Park

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Tel: 03000 99 66 99

http://www.sepa.org.uk/contact/

Northern Ireland Environment Agency

https://www.daerani.gov.uk/northernireland-environmentagency

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