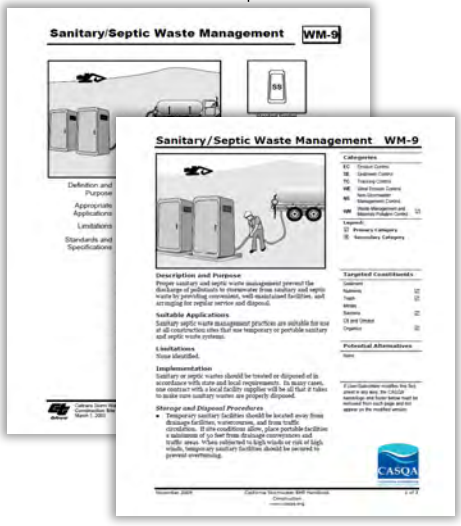
The Monthly Dirt
A monthly newsletter on the California Construction General Permit

Do you know what the BMPs are for porta-potties?

Outhouse, porta-potty, port-a-john, portable toilet, sanitary facility, etc. You know what we're talking about... the little plastic huts which populate every construction site and make life and work so much more comfortable. But when it comes to BMPs, talking about portable toilets is probably the last topic on that list. However, knowing how to properly install these sanitary facilities, inspect and maintain them, and respond in the case of a leak or spill is crucial. You're dealing with wastewater that's harmful to both storm water and human health and safety. And just like for everything else, there are some porta-potty **B**est **M**anagement **P**ractices which should be observed to ensure these facilities don't pollute your site's storm water runoff. In this month's edition of **The Monthly Dirt**, we're going to address why it's a good idea to properly facilitate the installation and maintenance of your facilities before they can become a hazard.

INSTALLATION: The first step in properly facilitating the facilities is to place them in just the right location. When deciding where to locate portable toilets on your site, it's best to use common sense and also reference the CASQA or Caltrans BMP Cut Sheets – *did you know there are cut sheets all about the placement and maintenance of sanitary facilities?* That's right! WM-9 is dedicated to portable sanitary facilities and has some very helpful information. To get things started, first make sure the toilets are on level surfaces – no one wants to use a portable toilet which threatens to tip over and roll away while being occupied. *Yuck!* Second, ensure the units are easily accessible to site workers and the maintenance truck – no one wants to hike all the way to the other end of the construction site just to use the facilities. Placing these facilities in convenient places is not only, let's face it, convenient, but according to the CASQA and Caltrans Cut Sheets this is a requirement *(if you think we're joking, look it up!)*. Third, portable toilets should be located at least 50 feet away from drainage facilities (i.e. drain inlets or site outfalls), watercourses (both man-made and natural rivers, streams, canals, etc.), and from traffic circulation. Seriously, using common sense in the placement of the facilities is a definite must – don't put these potential pollutant sources near a waterway or around a heavily trafficked area which could cause them to be knocked over and have a discharge straight to a waterbody (plus who wants to use an outhouse right in the center of traffic... *awkward!!*) Fourth, each portable toilet should be secured with a spike or stake so it won't be blown over in high winds – going on a hunt for a missing outhouse after high winds whip through a project site isn't exactly fun. It's also a good idea to locate portable toilets on permeable surfaces whenever possible. In case one of the units develops a leak or falls on its side, the contents will most likely leach into the ground instead of flowing into a storm drain; however, that brings its own set of issues, since wastewater should never be discharged or buried on site.[1] In the case that this should occur, contact the rental company for assistance in cleaning up the spill *(but more about this to follow... keep reading!)*



The Construction General Permit also has a couple things to say about porta-potties. Since there is potential for leaks or accidental discharges, the Permit calls for all portable toilets to have containment to prevent discharges of pollutants to the storm water drainage system or receiving water. The Permit also states that good housekeeping should be implemented for these facilities, which means that they should be regularly cleaned or replaced and frequently inspected for leaks and discharges. Which, if you were wondering, checking and making sure portable toilets are secured and contained is part of the weekly inspection every construction site has to do. Lastly, it is the project manager's responsibility to make sure there is an adequate number of porta-potties on the job site, and that they are regularly cleaned and serviced. If there are not

▸ Wondering what a QSP has to say about portable toilets on a construction site? Watch this Storm Water Awareness Week 2021 workshop and hear from QSP Mike Lewis

enough toilets, or they are not serviced properly, they could overflow and cause an illicit discharge. Also take into consideration weather and outside temperature must when choosing how many porta-potties should be rented for your site. As the temperature rises, people tend to drink more water, which means more trips to the facilities. If you do not take this into account, you could have an unpleasant situation on your hands. Facilitating the installation and details of the facilities at your construction site is an important task, not only for the health and safety of the environment, but also for the health and safety of all the workers on site!

MAINTENANCE: Maintenance for portable facilities, while being a very necessary task, can also be the most likely source of an illicit discharge due to sloppy servicing, maintenance, and cleaning. And as we already learned, wastewater from a portable toilet never should be discharged or buried within the project site. First of all, that's just disgusting. And second, the pathogens from wastewater can wreck serious havoc on storm water and the ecosystem. For systems that discharge directly into sanitary sewer systems, make sure to comply with local, state, and federal regulations. For systems that don't have that ability, be sure to pick a reliable and reputable company that won't leave you in a lurch by not servicing the portable units on a regular basis or doing the maintenance properly. In regards to cleaning, keep in mind that rinsing out the interior of a portable toilet can generate quite a bit of contaminated runoff if not done properly. Only a licensed service should perform cleaning and maintenance on the portable toilets for that reason. However, as the project manager, it is your responsibility to make certain the cleaning job is done properly and that no rinse or wash water is released on your site. Neglecting to keep the portable toilets clean can actually result in some big problems. Porta-potty rental companies say that a common response to unsanitary porta-potties is disgruntled workers tipping the offending unit on its side – potentially resulting in a big environmental headache.

ACCIDENT RECOVERY: But if a portable toilet does have a discharge on your site, what should you do? Obviously, you must make sure the discharge does not reach the storm drain, but hopefully you followed correct installation procedures and the secondary containment has done its job and prevented the leak or discharge from traveling further than it should. If this is the case, call the portable toilet vendor and have them come take care of the spill – they are trained professionals who have all the adequate personal protective and clean-up equipment. If there is no secondary containment, or the spill breached the containment tray, use whatever BMP materials you have available to make sure the spill does not flow into the storm drain or waterway *(don't forget to use appropriate personal protective equipment to protect your health and safety since you are dealing with raw sewage),* and immediately call the porta-potty company to have them clean up the spill.

NON-VISIBLE POLLUTANTS: One final note – if any of the portable toilets on your site cause a discharge, the Construction General Permit requires you to test for non-visible pollutants (i.e. fecal coliform bacteria) as part of your next sampling event, *even if the discharge happened in the middle of the dry season*. A visible pollutant is something that can be detected visually in a storm water discharge – such as petroleum sheens, suspended solids, sawdust, or drywall dust. While non-visible pollutants include things that can't be easily seen in a discharge – fecal coliforms from a portable toilet spill, insecticides and herbicides from landscaping activities, etc. According to the Permit, each discharger is responsible for developing a list of potential pollutants that are or could be present on the project site. This list should include all potential non-visible pollutants. For instance, if you have portable toilets, you will need to include fecal coliforms on the potential pollutant list. Plus, if there is contaminated soil on the project site due to historical activities or spills (including recent history), nonvisible pollutant monitoring will need to be performed. And according to the Permit's Fact Sheet, non-visible pollutant monitoring is required whenever pollutants associated with construction activities may be discharged with storm water due to a spill, BMP failure, or failure on the part of the discharger to adequately clean up construction materials or pollutants. Non-visible pollutant sampling would definitely be triggered in the case of a portable toilet leak or spill.

But how exactly does one sample for non-visible pollutants? It's not like you can see them! That's a great question! For non-visible pollutant sampling, 2 samples should be collected during the first 2 hours of the next rain event after the spill occurred. One sample is collected downstream of the spill and the other one is collected upstream of the spill. Both samples are compared to see if the spill was properly cleaned up, or if pollutants are still present.

Sanitary facilities are a necessary commodity for every job site, but they can sometimes be a little gross, especially if their contents show up where they are not supposed to be. However, if you facilitate the best management practices outlined above, your chance of an accidental discharge from one of these facilities should be greatly minimized. Just remember these three things – make sure you have enough porta-potties on your site, secure them tightly inside secondary containment, and have them properly and regularly serviced. **MD**

[1] WM-9 Cut Sheet

Please contact us if you have any questions ...

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