The Monthly Dirt

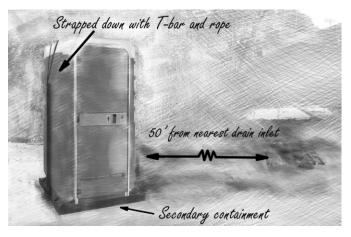
A Monthly Newsletter on the Californía Construction General Permit By WGR Southwest, Inc.



It's not something that anyone wants to talk about, but let's face it – if people are on a construction site for any length of time, odds are a few of them will have to use the facilities. But if the facilities haven't been built yet, where do they, um, go? The answer is portable toilets – the little blue plastic huts that pop up at nearly every construction site. And just like everything else on the job site, there are some porta-potty best management practices that must be observed to make sure these necessary commodities don't pollute your site's storm water runoff. If a portable toilet is going to cause a discharge, it will most likely be a result of either improper installation, or sloppy maintenance and cleaning.

INSTALLING THE HUTS

When deciding where to locate portable toilets on your site, use your common sense and reference the <u>CASQA</u> and <u>Caltrans</u> BMP cut sheets. Make sure the toilets are on level surfaces, that they are easily accessible by site workers and the maintenance truck, and they are at least 50 feet away from a drain inlet or site outfall. Each portable toilet should be secured so that they are not blown over in high winds. Also, portable toilets should be located on permeable surfaces wherever possible. In case one of the units develops a leak or falls on its side, the contents will more likely leach into the ground instead of flowing into a storm drain. The Construction General Permit also has a couple things to say about porta-potties: all portable toilets must have containment to prevent discharges of pollutants to the storm water drainage system or receiving water and that they must be regularly cleaned and inspected. Finally, 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 enough toilets, or they are not serviced properly, they could overflow and cause an illicit discharge. Though it may seem silly, weather and



outside temperature must be considered when choosing how many port-a-johns will be rented for your site. When the temperature rises, people tend to drink more water, which means more trips to the bathroom. If you do not take this into account, you could have an unpleasant situation on your hands.

KEEP 'EM CLEAN!

The most likely cause of an illicit discharge from a portable toilet is sloppy servicing, maintenance, and cleaning. Wastewater from a portable toilet never should be discharged or buried within the project site. For systems that discharge into sanitary sewer systems, make sure to comply with local, state, and federal regulations. 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, and most porta-potty rental companies will come and perform maintenance on their sanitary units. 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. Instead of washing the portable toilets with a hose or high-volume pressure washer, both of which generate large amounts of wastewater, it is better to use a mop, bucket, and rag. 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 for disgruntled workers to tip the offending unit on its side – potentially resulting in a big environmental headache.

UH-OH. NOW WHAT?

If a portable toilet does cause 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. If this is the case, call the portable toilet vendor and have them come take care of the spill. 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 (using appropriate personal protective equipment), and call the porta-potty company to have them clean up the spill. 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 (fecal coliform bacteria) as part of your next sampling event, even if the discharge happened in the middle of the dry season. See the sidebar on the next page for a discussion on sampling procedures. *Continued on next page*.

Continued from page 1 Porta-potties 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 follow all of the best management practices outlined above, your chance of an accidental discharge will be greatly minimized. Just remember these three things – make sure you have enough portapotties on your site, secure them tightly inside secondary containment, and have them properly and regularly serviced. **MD**

SAMPLING AFTER A LEAK

What should you do when you see liquid coming out of a portable toilet on your site?

If one of the portable toilets on your site causes a discharge, you will need to sample for non-visible pollutants. There are many other types of activities that can also generate invisible pollutants, which can be washed into a drain inlet during a rain event.

To check for the presence of these contaminants, you will need to collect **2** samples during the first **2** hours of the next rain event – one at the outfall downstream of the pollutant source, and one at a location up-gradient or crossgradient of the source.

Listen to this SWPPP Radio episode for more information about sampling for nonvisible pollutants.

SVPPP

http://wgr-sw.com/podcasts/listen.php?ID=9

And... what's wrong with this photo??? (Hint: where is the containment tray?)

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Please contact us if you have any questions ...

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John Teravskis, QSD/QSP, CPESC, Editor of *The Monthly Dirt*, will discuss the Living Wall demonstration project located at WGR's Lodi office.



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March 10-Lodi, CA: WGR Southwest, Inc., 11780 N. Hwy 99, Lodi, CA 95240

March 11-Aptos, CA: Best Western/Seacliff Inn, 7500 Old Dominion Court, Aptos, CA 95003 (State Park Drive Exit) March 12-San Jose, CA: Ewing Irrigation, 1605 Old Bayshore Hwy, San Jose, CA 95112

Register at www.filtrexx.com/lw-cal

For more information, contact Bryan Hofmann at 209-200-7841 or bryan.hofmann@filtrexx.com



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Our Universal Spill Bucket is a convenient, all-in-one spill kit inside a UN-rated screw-top pail. The screw-top not only allows easy access, but ensures the bucket is closed and sealed when not in use. Each spill bucket includes approx. 2.5 gallons of granular absorbent, 6 universal spill pads, 1 universal absorbent sock, and two 2.5 mil 18-gallon waste bags, all of which are clearly labeled. One unique feature of our spill kits is that each one comes equipped with personal protective equipment - a pair of clear safety glasses and nitrile gloves are packed on

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