

FORT NOVOSEL

Environmental Document

ENV-WA004: Washrack and Oil Water Separator Operation and Maintenance (28 MARCH 2025)

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1.0 PURPOSE

This procedure defines the requirements for proper operation and maintenance of washracks and oil water separators (OWS) to ensure compliance with the National Pollutant Discharge Elimination System (NPDES) permits for Fort Novosel.

Control of environmental procedures is addressed in procedure ENV-P002: Document Control.

2.0 SCOPE

This procedure applies to all military, civilian and contract personnel at Fort Novosel that utilize washracks and OWS.

3.0 DEFINITIONS

Term	Definition
DPW-ENRD	Directorate of Public Works, Environmental and Natural Resources Division, located in Bldg. 1121; Phone: 334-255-1658
ADEM	Alabama Department of Environmental Management
AWE	American Water Enterprises, Incorporated
NPDES	National Pollutant Discharge Elimination System
Washrack	Facility for washing small amounts of dirt, oil, grease off of equipment
Grit Chamber	Area that allows for large volumes of washrack water to slow down and allow solids to settle out before entering into the OWS
OWS	Oil Water Separator – used to separate small residual amounts of oil and grease from wash water prior to discharge into the sanitary sewer

4.0 RESPONSIBILITIES

Role	Responsibility
Using Activity	<ul style="list-style-type: none">• Ensure designated individuals are trained in the use of the washrack / OWS system by reviewing this work instruction and being provided applicable on-the-job training• Conduct required inspections using AVCOE Form 2712, <i>Washrack Inspection Checklist</i>• Validate that inspections are being conducted weekly

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Role	Responsibility
	<ul style="list-style-type: none">• Submit copies of completed inspections to DPW-ENRD by the 15th of the following month
Support Services Contractor	<ul style="list-style-type: none">• Respond to maintenance and repair calls for washracks and OWS• Manage the central vehicle wash facility• Ensure all washracks and OWS are operating correctly• Conduct required inspections using AVCOE Form 2712, <i>Washrack Inspection Checklist</i>• Submit copies of completed inspections to DPW-ENRD by the 15th of the following month
DPW-ENRD	<ul style="list-style-type: none">• Provide oversight to maintenance and operational activities on washracks• Provide recommendations for new or replacement OWS• Validate that detergents will not interfere with proper operation of OWS• Ensure compliance with installation NPDES permits• Coordinate with AWE as required for changes in discharge to sanitary sewer

5.0 PROCEDURE

5.1 Airfield Washracks

- 5.1.1 Airfield washracks will be used for washing aircraft and related aircraft support equipment (yellow gear and mules – on an as-needed basis) ONLY. All other vehicle and equipment washing will occur at the central vehicle washrack located on main post, adjacent to Bldg. 1431 (See Section 5.2 below).
- 5.1.2 Inspect the washrack once a week (for shared washrack facilities, the predominant user is responsible for inspections) utilizing AVCOE Form 2712, *Washrack Inspection Checklist*. Call the Work Control Center at 255-9041 if the washrack or OWS appears to not be functioning properly. Submit copies of completed inspections to DPW-ENRD by the 15th of the following month.
- 5.1.3 Ensure personnel using the washrack are instructed on proper usage procedures (review of this work instruction and on-site familiarization).
- 5.1.4 Remove excess mud, grit, leaves, and trash from the washrack area for disposal in a dumpster. Clean trench drains and inlet grates of trash, accumulated leaves, and debris.

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- 5.1.5 No detergents or other substances will be used on the washrack without prior approval from DPW-ENRD at 255-1658; the quantity used will be the minimum required for effective cleaning to reduce the impact on the sewage treatment plant.
- 5.1.6 Engine gas-path cleaning is authorized on airfield washracks. The amount of gas-path cleaner used will be no more than the minimum required by standard operating procedures.
- 5.1.7 For washracks that have diversion valves, ensure they are positioned for proper operation in accordance with posted instructions near the valve:
 - 5.1.7.1 When washracks are not being utilized for washing, the valves will be positioned to cause the runoff to flow into the storm drain system.
 - 5.1.7.2 While washing, the valves will be positioned to cause the flow to discharge to the OWS.
- 5.1.8 Ensure that solvents, fuels or other hazardous materials are not stored on or released in to the washrack. Notify DPW-ENRD at 255-1658 and the Work Control Center at 255-9041 if the washrack or OWS exhibits a strong odor of any of these types of materials or if there is evidence of dumping. Personnel should implement spill response procedures for all releases of hazardous materials in accordance with the Site Specific Spill Plan and ISCP.
- 5.1.9 Ensure hoses and faucets are not leaking or running when not actively washing aircraft or vehicles. If leaking, notify the Work Control Center at 255-9041.
- 5.1.10 No maintenance or refueling/defueling of vehicles, aircraft, or equipment will be performed on the washrack.
- 5.1.11 Cleaning the grit chamber of entrapped grit is required before the grit level reaches the top of the v-notch weir or the invert (bottom) of the effluent pipe. The using activity will notify the Work Control Center at 255-9041 when the grit chamber is full in order to have the Support Services Contractor clean the grit chamber (where applicable). Individuals should NEVER enter the grit chamber or the OWS.

5.2 Central Vehicle Washrack

- 5.2.1 Will be used for washing all equipment and vehicles EXCEPT garbage trucks.
- 5.2.2 Ensure personnel using the washrack are instructed on proper usage procedures (review of this work instruction and on-site familiarization).

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- 5.2.3 No detergents or other substances will be used on the washrack without prior approval from DPW-ENRD at 255-1658; the quantity used will be the minimum required for effective cleaning to reduce the impact on the sewage treatment plant.
- 5.2.4 Objects larger than the washrack will be positioned so that wash water from the portion being washed drains into the washrack drain.
- 5.2.5 Ensure that all trash and debris is removed from the washrack after washing vehicles or equipment.
- 5.2.6 Ensure that solvents, fuels or other hazardous materials are not stored on or released in to the washrack. Notify DPW-ENRD at 255-1658 and the Work Control Center at 255-9041 if the washrack or OWS exhibits a strong odor of any of these types of materials or if there is evidence of dumping. Personnel should implement spill response procedures for all releases of hazardous materials in accordance with the Site Specific Spill Plan and ISCP.
- 5.2.7 Ensure hoses and faucets are not leaking or running when not actively washing aircraft or vehicles. If leaking, notify the Work Control Center at 255-9041.
- 5.2.8 No maintenance or refueling/defueling of vehicles, aircraft, or equipment will be performed on the washrack.

5.3 Organization-Operated Washracks/Oil Water Separators

- 5.3.1 Will be used for washing all equipment and vehicles EXCEPT garbage trucks.
- 5.3.2 Ensure personnel using the washrack are instructed on proper usage procedures (review of this work instruction and on-site familiarization).
- 5.3.3 Inspect the washrack once a week (for shared washrack facilities, the predominant user is responsible for inspections) utilizing AVCOE Form 2712, *Washrack Inspection Checklist*. Call the Work Control Center at 255-9041 if the washrack or OWS appears to not be functioning properly. Submit copies of completed inspections to DPW-ENRD by the 15th of the following month
- 5.3.4 No detergents or other substances will be used on the washrack without prior approval from DPW-ENRD at 255-1658; the quantity used will be the minimum required for effective cleaning to reduce the impact on the sewage treatment plant.
- 5.3.5 Objects larger than the washrack will be positioned so that wash water from the portion being washed drains into the washrack drain.
- 5.3.6 Ensure that all trash and debris is removed from the washrack after washing vehicles or equipment.

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- 5.3.7 Ensure that solvents, fuels or other hazardous materials are not stored on or released in to the washrack. Notify DPW-ENRD at 255-1658 and the Work Control Center at 255-9041 (or unit specific maintenance activity as applicable) if the washrack or OWS exhibits a strong odor of any of these types of materials or if there is evidence of dumping. Personnel should implement spill response procedures for all releases of hazardous materials in accordance with the Site Specific Spill Plan and ISCP.
- 5.3.8 Ensure hoses and faucets are not leaking or running when not actively washing aircraft or vehicles. If leaking, notify the Work Control Center at 255-9041 (or unit specific maintenance activity if applicable).
- 5.3.9 No maintenance or refueling/defueling of vehicles, aircraft, or equipment will be performed on the washrack.
- 5.3.10 All organizations that are required by ADEM rules to maintain their own NPDES permit must submit a copy of the permit to the DPW-ENRD. DPW-ENRD must be notified immediately if there is a violation of the existing permit for the facility as it is located within the confines of Fort Novosel. The organization is responsible for maintaining compliance with their permit and any applicable reporting.

5.4 DPW – Support Services Contractor

- 5.4.1 Conduct periodic inspections of all washrack facilities, and weekly inspections of the Central Vehicle Wash Facility utilizing AVCOE Form 2712, *Washrack Inspection Checklist*. Submit copies of completed inspections to DPW-ENRD by the 15th of the following month.
- 5.4.2 Conduct maintenance and repair (other than defined user maintenance described in Sections 5.1 and 5.2 above).
- 5.4.3 Operate oil skimmer at the Central Vehicle Wash Facility.
- 5.4.4 Inspect the used oil AST at the Central Vehicle Wash Facility weekly using AVCOE Form 2711, *Spill Prevention, Control, and Countermeasures Plan Container Inspection Checklist*.
- 5.4.5 Schedule pump out of sludge for all OWS as necessary for proper operation and ensure arrangements for proper disposal are made.
 - 5.4.5.1 Sludge must be sampled and submitted to DPW-ENRD for analysis. Specific analysis requested will be determined by DPW-ENRD. The procedures requested may include, but are not limited to, the toxicity characteristic leaching procedure (TCLP) or analyses to determine presence/concentration of PCBs, sulfides, cyanides, total extractable organic halogens (TOX), or petroleum products.

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5.4.5.2 DPW-ENRD will review analysis results prior to disposal and assist with completing ADEM Form 300, *Solid Waste Profile Sheet*, if it is determined that the waste is not hazardous. If the waste is hazardous, the waste will be managed in accordance with the Hazardous Waste Management Plan. DPW-ENRD will provide specific waste handling guidance as necessary.

5.4.5.3 TCLP results, a completed ADEM Form 300, and a check for the appropriate fee must be sent to ADEM to be granted approval to dispose sludge at the landfill. A copy of the Waste Certification received from ADEM will also be provided to DPW-ENRD.

5.4.6 Police/pickup solid waste at the Central Vehicle Wash Facility.

5.4.7 Remove sand/grit in the grit chamber of the Central Vehicle Wash Facility as necessary following disposal requirements outlined in Section 5.4.5 above.

5.5 DPW-ENRD

5.5.1 Inspect all washracks quarterly utilizing AVCOE Form 2717, *Environmental Compliance Inspection Checklist*.

5.5.2 Evaluate products for use on washracks/OWS.

5.5.3 Evaluate proposals to install new OWS and washracks.

5.5.4 Review required inspections by using activities and Support Services contractor to evaluate trends in operational failures with existing systems and the need for additional training. Update policies and procedures or submit work orders, as appropriate, to correct system failures.

6.0 FORMS AND RECORDS

AVCOE Form 2711, *Spill Prevention, Control, and Countermeasures Plan Container Inspection Checklist*

AVCOE Form 2719, *Site Specific Spill Plan*

AVCOE Form 2712, *Washrack Inspection Checklist*

AVCOE Form 2717, *Environmental Compliance Inspection Checklist*

ADEM Form 300, *Solid Waste Profile Sheet*

7.0 REFERENCES

ENV-P002: Document Control

Site Specific Spill Plan

Installation Spill Contingency Plan (ISCP)