

GPP 19: Vehicles: Servicing and Repairs

These guidelines are produced by Natural Resources Wales, the Northern Ireland Environment Agency and 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

1. Introduction

Garages, service centres and car washes carry out a number of activities that could cause pollution. These include:

- storage, use and disposal of liquids such as: oil, paint, Ad blue, brake fluid, solvents and antifreeze
- Dealing with wastes such as: oil filters, exhaust systems, batteries, tyres
- Dewaxing, washing and cleaning vehicles using: solvents, detergents, high pressure washers, steam cleaners.

This guidance is aimed at businesses that deal with vehicles, but much of the guidance will apply to other machinery, plant and equipment.

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2. Site Drainage

2.1 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. Your plan should also show clearly silt traps, oil interceptors and any other drainage infrastructure incorporated into the drainage network.

All garages should have an oil separator installed on the surface water drainage system. You need to inspect it 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

2.2 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).



BLUE for connections to surface water drains



RED for connections to the foul sewer

Clean uncontaminated runoff from roofs should go directly to surface water drains, if possible downstream of the oil separator. You may need permission from your environmental regulator for any discharge to surface waters from an oil separator - contact them to find out what the requirements are. Contact details are at the end of this document.

Roof water downpipes should connect directly to the surface water system using sealed top, side entry gullies or direct drain points. If you avoid using open grates then this will help you prevent contaminated water entering the surface water drains.

2.3 Contaminated water and trade effluent consents

All contaminated water used for cleaning, from wash basins 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. Colour coding of drains will help this; blue for surface water drains and red for connections to the foul sewer.

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

2.4 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. Make sure your staff know how to use them.

2.5 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.

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 other liquids entering the sewer.

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.

3. Managing Waste from Vehicle Maintenance

3.1 Duty of Care for waste

Waste management begins with applying the waste hierarchy. You can get free advice on reducing, reusing and recycling your business waste from the support organisations listed in Reference 10.

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
- 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 (WTN) for a minimum of two years, and Hazardous Waste Consignment Notes (WCN) for a minimum of three years. If you have a regular collection of the same materials from one waste management company you can use a “season ticket” WTN. One off collections will still require a WTN or WCN

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

See Reference 4 - Duty of Care: Codes of Practice

3.2 Hazardous/special waste

Waste is considered to be hazardous when it might be harmful to human health or the environment. Examples of waste with hazardous properties include:

- chemicals,
- oil including waste oil
- solvents
- batteries (particularly those containing lead or mercury)
- oil separator waste
- waste electrical equipment which contains potentially harmful components.

If your business produces waste with hazardous properties you must comply with legal obligations that control how you store, transport, treat and dispose of it.

If you keep hazardous/special waste on your premises, even for a short period of time, you must:

- ensure that it is stored safely and securely to prevent pollution
- ensure that it is packaged and labelled correctly
- keep different types of hazardous/special waste separate, and keep hazardous/special wastes separate from non-hazardous waste
- keep liquid hazardous/special waste in a dedicated area, with a bund or barrier to contain spills and leaks
- regularly check storage areas for leaks, deteriorating containers or other potential risks.

See Reference 5 - Hazardous/Special waste

3.3 Waste liquids

Used liquids, such as hydraulic fluid, coolant and solvents from degreasing activities, must not be disposed of into surface water systems. They should be collected separately in sealable containers for recycling or disposal. Store containers where

they are safe from collisions and on a bunded, impermeable surface with no route to drains.

Several companies offer a collection service for hydraulic fluid, antifreeze and solvents. Contact a waste management company to have them collected and sent for recycling. Equipment for on-site coolant recycling is available.

Used lubricating oil should be collected separately in a suitably bunded tank. This oil can also be collected for recycling.

See Reference 6 - GPP08: Storage and Handling of Waste Oil

3.4 Batteries

Batteries containing acid should be stored intact and upright in an acid resistant bunded compound or purpose built bin.

You can request free collection of waste automotive batteries from any producer who currently supplies new automotive batteries. For a list of registered producers, see Reference 7: National Waste Data

You may find that the value of lead in waste automotive batteries means that independent battery collectors may approach you to purchase and take away your waste batteries due to their value.

You must make sure your waste automotive batteries are stored, handled, recycled or disposed of safely and legally by licensed individuals or businesses. See Reference 13: Public registers of licensed waste carriers, and see Reference 5: Hazardous/special waste.

Storage can be minimised by the use of one-for-one exchange schemes, whereby old batteries are collected when new ones are delivered.

3.5 Tyres and vehicle parts

Tyres, old exhausts and other discarded car parts should be stored securely to prevent theft, vandalism, or arson.

Metal parts should be segregated and collected for recycling by a licenced waste carrier. Tyres cannot be sent to landfill, except those with a diameter greater than 1.4m. You should find a local waste contractor who can take them for recycling.

In Northern Ireland and Wales, if you store used tyres you must have an exemption from your environmental regulator. In Scotland, the storage of waste tyres requires a Waste Management Licence. See Reference 14: Waste exemptions and permits for storage of waste tyres.

Any vehicle parts that contain hazardous materials such as asbestos must be segregated and disposed of as hazardous/special waste.

3.6 Oil filters and oil contaminated parts

There are collection schemes available for used oil filters. These schemes supply and collect drums into which you put all your used oil filters. Alternatively, discarded oil filters can be crushed on site and the oil and metal recovered. Intact or crushed filters and other oil contaminated parts such as engines, gearboxes and axles should be stored either in a sealed container or within an impermeable bunded area, preferably roofed to prevent the entry of rain.

3.7 Other materials

Skips should be clearly marked to indicate what materials they may be used for. Material stored in skips should be either dry or drained of any liquids. You should cover the skips to prevent the entry of rainwater, and make sure they are watertight to prevent leakage. If any contaminated liquid does accumulate, it should be removed and suitably disposed of. This may need to be disposed of as Hazardous/special waste. Note that scrap metal is a waste and as such the Duty of Care applies and transfer notes will be required.

4. Oil, Fuel and Chemical Storage

4.1 Above ground oil storage

For details of the requirements of the Oil Storage Regulations see Reference 8 - GPP 02 Above Ground Oil Storage

For details of storage of waste oils see Reference 6 GPP 08 - Handling and Storage of Waste Oil

Oil must be stored in a container that is strong enough for ordinary use, either in an integrally bunded tank or in containers surrounded by an impermeable bund that has adequate capacity. The bund must be able to contain 110% of the capacity of a single storage container. If you have more than one oil storage tank in the system, the

secondary containment must be capable of storing 110% of the biggest tank's capacity or 25% of the total capacity, whichever is the greater. Details can be found in Reference 8: GPP 2 - Above ground oil storage tanks.

All fill and draw pipes, valves and sight gauges must be enclosed within the bund and tank vent pipes must be directed into the bund, so that in the event of overflowing the discharge is contained.

Bunds should be examined on a regular basis and, if the tank sits in an external bund, any rainfall that accumulates removed by bailing or by pumping under a manually controlled system. This water may be contaminated and may need to be disposed of as hazardous/special waste. Fitting a roof over the oil storage bund can save money in the long term. However, before fitting a roof you should consider aspects of health and safety for delivery and maintenance as well as fire safety.

4.2 Underground storage tanks

Underground tanks and pipelines are susceptible to damage and corrosion, and you should consider above ground storage where possible. In areas of high groundwater vulnerability (Reference 9: Groundwater protection) your environmental regulator may object to the installation of underground storage tanks.

Where underground storage is necessary, a number of protective measures, such as double skinned tanks and piping, and leak detection may be required. Regular inspection, stock reconciliation and pressure testing are essential, especially where groundwater pollution could occur.

The location of underground piping should be identified and clearly marked in order to avoid damage through excessive surface loading from vehicles and machinery.

4.3 Chemical storage

Chemicals such as antifreeze, paints, Ad blue, thinners, detergents, degreasers, solvents and hydraulic fluids 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

- bunded with impermeable base and with drip trays for delivery hoses.

(See Reference 16: Solvents Code of Practice)

You should use secure, bunded storage cabinets. 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.

You should label storage vessels to show their contents, and you should keep them 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.

4.4 Refuelling areas

The risk of pollution from refuelling areas is especially high. Such areas should be isolated from general yard drainage, (for example by using a raised kerb or roll-over bund). You should take particular care when cleaning such areas.

If possible, cover refuelling areas to prevent runoff. If this is not possible then keep the runoff from refuelling areas separate from general surface water runoff. Drain any runoff via an oil separator to a foul sewer if available.

Any discharge from an oil separator directly to the environment (waterway or drainage fields/soakaway) may require consent to discharge:

- In Northern Ireland, under the terms of the Water (Northern Ireland) Order 1999.
- In Scotland, under the terms of the Controlled Activities (Water Environment) Regulations 2011
- In Wales, under the terms of The Environmental Permitting (England and Wales) Regulations 2016

Make sure your oil separator is properly maintained and is in working order.

See Reference 15 - GPP 07 The Safe Operation of Refuelling Facilities

4.5 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, the effluent should be drained to a sealed sump. Effluent from high pressure water and steam cleaners can cause problems and these should only be used in designated washbays. Separate guidance on these is available (Reference 11: GPP13 – Vehicle Washing and Cleaning) (Reference 12 Planning advice)

NB. Particular care should be taken 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 or to a drainage field/soakaway. Disposal to foul sewer may also be unacceptable and the sewerage undertaker must be contacted. See Reference 2: Water and sewerage providers.

4.6 Cleaning yards and forecourts

Have a site drainage plan – see section 1

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:

- i. 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. A valve is fitted at the oil separator outlet to close it off during the cleaning operation and all accumulated washings removed for disposal off-site. An alarm should be installed to indicate that the closure valve is in the shut position.

5. 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 sewer – takes contaminated water via a public sewer to a waste water treatment plant
Groundwater – all water which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil
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 – A pipe that conveys sewage and/or wastewater to a 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 – Sustainable Urban Drainage Systems (Sustainable 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 that contain the runoff from washing activities
Waste carrier – someone licenced to collect your waste.

6. References

Reference 1: GPP 03 Installation and maintenance of Oil Separators

<http://www.sepa.org.uk/media/60086/ppg-3-use-and-design-of-oil-separators-in-surface-water-drainage-systems.pdf>

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.sepa.org.uk/media/100557/ppg-21-pollution-incident-response-planning.pdf>

Reference 4: 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 – Wales

<https://www.gov.uk/government/publications/waste-duty-of-care-code-of-practice>

Reference 5: Hazardous waste – Wales

<http://naturalresources.wales/waste/hazardous-waste-returns/?lang=en>

NetRegs: Hazardous/special waste – Northern Ireland and Scotland

<http://www.netregs.org.uk/environmental-topics/waste/hazardous-special-waste/>

Reference 6 GPP08: Storage and Handling of Waste Oil

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

Reference 7 National Packaging Waste Database: Batteries producers

<http://npwd.environment-agency.gov.uk/Public/PublicProducerReports.aspx>

Reference 8 GPP 02 Above Ground Oil Storage

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

Reference 9 Groundwater protection

NIEA – Groundwater <https://www.daera-ni.gov.uk/articles/groundwater>

SEPA - Groundwater protection policy for Scotland

<http://www.sepa.org.uk/media/34371/groundwater-protection-policy-for-scotland-v3-november-2009.pdf>

SEPA: CAR – A practical guide

http://www.sepa.org.uk/media/34761/car_a_practical_guide.pdf

NRW – Prevent pollution from underground oil storage tanks

<http://gov.wales/topics/environmentcountryside/epq/waterflooding/publications/groundwater-protection-codes-for-wales-underground-storage-tanks/?lang=en>

Reference 10

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

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

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

Reference 11 GPP 13 Vehicle washing and cleaning

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

Reference 12 Planning advice

Northern Ireland Planning: Standing advice 25 - Vehicle washing

http://www.planningni.gov.uk/index/advice/northern_ireland_environment_agency_guidance/standing_advice.htm

Scottish Government Planning technical handbook – Non domestic section 3
<http://www.gov.scot/Topics/Built-Environment/Building/Building-standards/techbooks/techhandbooks/th2016nondomenvironment>

Reference 13: Public registers of licensed waste carriers

Northern Ireland - [NIEA: Registered carriers / transporters database](#)

Scotland - [SEPA: Registered waste carriers and brokers](#)

Wales - [Wales: Registered Waste Carriers](#)

Reference 14: Waste exemptions and permits for storage of waste tyres

Northern Ireland: Paragraph 41 exemption <https://www.daera-ni.gov.uk/articles/temporary-storage-waste-including-weee-pending-its-collection-place-where-it-produced>

Wales: NWFD 2 Temporary storage of waste at the place of production
<https://www.gov.uk/guidance/waste-exemption-nwfd-2-temporary-storage-at-the-place-of-production--2>

Scotland: SEPA – Waste Management licences
<http://www.sepa.org.uk/regulations/authorisations-and-permits/application-forms/>

Reference 15: GPP 7: the safe operation of refuelling facilities
<http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

Reference 16: Groundwater protection code for storage and use of solvents

DAERA Northern Ireland <https://www.daera-ni.gov.uk/articles/groundwater>

Scottish Environment Protection Agency
http://www.sepa.org.uk/media/60033/policy-19_groundwaternov09.pdf

Natural Resources Wales
<http://gov.wales/topics/environmentcountryside/epq/waterflooding/publications/groundwater-protection-codes-for-wales-solvents/?lang=en>

7. Contact details

England and Northern Ireland and Scotland:

Incident/Pollution hotline: **0800 80 70 60 (24 hrs)**

Wales: Emergency hotline: **0300 065 3000,(24 hrs)** (press 1)

Floodline - England, Wales and Scotland: **0345 988 1188**

Flooding incident line (NI): **0300 2000 100**

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Tel: 03000 99 66 99

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

Northern Ireland Environment Agency
<https://www.daera-ni.gov.uk/northern-ireland-environment-agency>

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