Pollution Prevention Training and Recognition Program for Surface Cleaners

Answers to frequently asked questions

Q: What is the Pollution Prevention Training and Recognition Program for Surface Cleaners?
A: Discharges from outdoor cleaning activities are difficult to deal with because of the variable quantity and quality of the discharge, the intermittent nature of the discharge, and the mobility of the discharger. The Pollution Prevention Training and Recognition Program for Surface Cleaners is a regional program initiated by the Bay Area Stormwater Management Agencies Association (BASMAA) and the San Francisco Bay Area Regional Water Board to help in breaking through barriers to pollution control and to establish a model for dealing with discharges of this type. The program is also noteworthy because it is an outreach-based program, designed to resolve problems through involvement and education of affected parties. The program emphasizes recognition of good businesses versus “bad actors.”

Q: What kinds of outdoor cleaning and cleaners are there?
A: There are four basic types based on the equipment or facility being cleaned: surface, transportation-related, food-related, and miscellaneous. There are two basic types of cleaners: contractors or “mobile” cleaners who hire out their services and employees of businesses that conduct outdoor cleaning as part of their job.

Q: How many contractors or mobile cleaners are there in the Bay Area?
A: In 1995, the San Francisco Bay Area Pollution Prevention Group, with funding from the Bay Area Dischargers Association and BASMAA, did a search for mobile cleaning businesses in the Bay Area and came up with about 4,000. This count includes surface cleaners, janitorial services, auto detailers, carpet cleaners, and window washers.

Q: Who are “surface cleaners?”
A: Surface cleaners are a subset of outdoor cleaners that clean flat surfaces or “flat work.” These surfaces include sidewalks, plazas, building exteriors, drive-through areas, cement parking areas and driveways, decks, and dumpster/grease cleaning and storage areas at restaurants and food handling establishments. Surface cleaning may also involve surface preparation before painting and graffiti removal. We estimate that there are 150 - 200 surface cleaners in the Bay Area.

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Q: Why are outdoor cleaning discharges a concern?
A: One of the two primary goals of the federal storm water regulations and NPDES storm water permits is to “effectively prohibit” non-stormwater discharges to storm drain systems. Washwaters are some of the more commonly observed non-storm water discharges and outdoor cleaners have been identified as a significant source of these discharges of material, wastes, and polluted waters to storm drain systems in the San Francisco Bay Area, as well as other parts of the country.

Q: Why was an outreach and recognition approach chosen to address outdoor cleaner discharges?
A: The following attributes of these discharges—the intermittent nature, the often small quantity discharged (few hundred gallons), and the timing (non-business hours)—make these discharges difficult to regulate in the traditional sense. In discussions with cleaners, their suppliers, Regional Water Board staff, and wastewater and storm water program staff, a consensus was reached that for a program to be successful, the customers of surface cleaners (who are also liable for these discharges) need as much education as cleaners to ensure that the value of hiring a responsible cleaner is understood. As a result, a program of education and recognition was produced.

Q: What information or data is there on these types of discharges?
A: There is some data on the quality and quantity of these discharges. In 1999, the Bay Area Pollution Prevention Group completed a study of surface cleaner discharges. Their study looked at discharges from local cleaners as well as data from Arizona and Texas. Although the volume of wastewater discharged by surface cleaning operations in the Bay Area is small, samples showed that concentrations of cadmium, copper, lead, mercury, zinc, pH, oil and grease, and total petroleum hydrocarbons were sometimes high enough to violate standards used for discharges entering wastewater treatment plants (“local limits”). As part of their NPDES permit compliance effort, the City of Fort Worth tested storm drain discharges and found detergents in over 50% of the samples. Repeated field observations identified surface cleaning activities as a significant source.

Q: What best management practice (BMP) sources are available and acceptable?
A: There are basically two sources. The original BMPs developed by the Cleaning Equipment Trade Association (CETA) (referred to as the “CETA BMPs”) in cooperation with the three South Bay treatment plants (Palo Alto, Sunnyvale, San Jose/Santa Clara) and the Santa Clara Valley Nonpoint Source Pollution Control Program cover almost all outdoor cleaning activities. The second source is “Pollution from Surface Cleaning,” which only covers surface cleaning activities. BASMAA and an advisory committee of representatives from CETA, surface cleaners, and treatment plants developed it. In developing Pollution from Surface Cleaning, small changes to the CETA BMPs for some surface cleaning activities were made to clarify and simplify decision making for cleaners on the job site.
Q: What does the recognition mean?
A: The “Certificate of Training” means that the surface cleaner has: 1) received training, 2) taken a self quiz on the training materials, and 3) “agrees to follow, to the greatest practical extent, pollution prevention practices including techniques for proper cleaning and wash water disposal, as described in the BASMAA surface cleaner’s training materials.”

Q: How does a surface cleaner get recognition?
A: Training is available online at: www.basmaa.org.

Q: How do I find “Recognized Surface Cleaners?”
A: BASMAA keeps and updates a database of Recognized Surface Cleaners. As soon as a trainee completes the online training and receives their Certificate of Training, they are automatically added to the database of BASMAA Recognized Surface Cleaners. As a result, the database is always up-to-date and can be checked at any time by going online. Municipalities use the database to promote recognized cleaners in their area, while potential customers use the database when soliciting bids for cleaning jobs.

If you have further questions about this program, please call contact BASMAA at info@basmaa.org or call BASMAA at 510-622-2326.