Mobile cleaners (surface cleaners, janitorial services, auto detailers, carpet cleaners, window cleaners) have been identified as a significant source of discharges of material, wastes, and polluted waters to storm drain systems in the San Francisco Bay Area. The environmental impact, regulatory liability, and ubiquitous nature of discharges from mobile cleaners make them a seemingly ideal candidate for regulation. Yet, regulators and regulated agencies have found it difficult to address these discharges for a variety of reasons. Consequently, the Bay Area Stormwater Management Agencies Association (BASMAA) has initiated a pilot program to help in breaking through the barriers to regulation and to establish a model for dealing with discharges of this type. The pilot program will focus on surface cleaners as a target group of mobile cleaners. Surface cleaners include steam cleaners and pressure washers that clean sidewalks, plazas, parking areas, driveways, drive-throughs, and building surfaces. The surface cleaner pilot program will be used as a prototype for developing materials and approaches for the remaining types of mobile cleaners.

To develop the surface cleaners pilot program, meetings were held with surface cleaners and their customers in which the participants were given a chance to express opinions on what would constitute a successful program. The primary opinion was that the customers need educating, as well as the surface cleaners, to ensure that the value of hiring a responsible surface cleaner is understood. As a result, a program consisting of education and recognition was produced. Surface cleaners who implement the prescribed pollution prevention practices will be "recognized" by BASMAA and promoted to potential customers. Recognition will be given to surface cleaners who attend an Outreach/Recognition Workshop and pass a test based on the workshop contents. BASMAA will then issue a "recognition letter" to cleaners who pass the test and a list of recognized cleaners will be provided to businesses and agencies that hire surface cleaners.

The outreach materials and events scheduled for the pilot program are described below:

"Pollution from Surface Cleaning" - This folder was prepared to educate surface cleaners about the effects of wash water discharges to the storm drain system and to prescribe effective, low-cost pollution prevention practices.

"We'll do the Job Right!" - This card will be distributed by "Recognized Mobile Cleaners" to potential customers. Surface cleaners will use this card to proclaim their qualifications and their intent to prevent water pollution while conducting the cleaning work.
"When You Contract for Surface Cleaning....." - This flyer is geared towards customers who regularly hire surface cleaners. It alerts the customers about the outreach/recognition program and specifies the pollution prevention practices that should be used to prevent surface cleaning discharges to the storm drain system. The flyer is suitable for photocopying and will be made available for mass mailings by the municipalities.

Outreach/Recognition Workshop - Outreach workshops will be held to provide surface cleaners with the technical information required to protect the environment, comply with the law, and become a Recognized Mobile Cleaner. The first workshop is scheduled for August 13 and two additional workshops are in the planning stages. The workshops will be videotaped for viewing by surface cleaners who were unable to attend one of the scheduled dates.

Recognition Test and Letter - The true/false, multiple choice exam will take 15-20 minutes to complete. Surface cleaners that correctly answer a minimum percent of the questions will receive a "recognition letter" from BASMAA. This letter can be displayed to customers as proof that the cleaner is qualified to complete the job in an environmentally responsible manner.

Pollution Prevention Voucher - The voucher is to be filled out in duplicate by a Recognized Mobile Cleaner upon completion of a cleaning project. Retention of a copy by both the cleaner and the customer provides a record for municipal or State inspectors of the type of surface cleaned, the cleaning method used, and how the wash water was disposed.

Database of Recognized Cleaners - BASMAA will prepare and update a database of Recognized Mobile Cleaners. Municipalities can request a copy of the database to promote recognized cleaners in their area, while potential customers can request a copy of the database when soliciting bids for cleaning projects.

Workshop Training Kit - A workshop training kit will be assembled to allow municipalities and/or POTWs the opportunity to offer the Outreach/Recognition Workshop at their discretion. Included in the kit will be a videotape of one of the scheduled workshops, outreach materials to be distributed, the recognition test, a scoring key, and instructions on how to conduct the workshop and administer the test.

2

June 27, 1996