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## B A S M A A

### **Pilot Source Control and Recognition Program for Mobile Cleaners**

#### **Answers to frequently asked questions**

**Q:** What is the Pilot Source Control Program for Mobile Cleaners?

**A:** Discharges from mobile 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 Pilot Source Control Program for Mobile Cleaners is a regional pilot program initiated by the Bay Area Stormwater Management Agencies Association (BASMAA) and the San Francisco Bay Area Regional Board to help in breaking through barriers to pollution control and to establish a model for dealing with discharges of this type. The pilot program is also noteworthy because it is an outreach based program, designed to resolve problems through involvement and education of affected parties. The pilot program emphasizes recognition of good businesses versus “bad actors.”

**Q:** Why are mobile cleaner 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 mobile 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 mobile 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 Board staff, and wastewater and storm water program staff, a consensus was reached that for a program to be successful, the customers of mobile 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:** How many mobile cleaners are there in the Bay Area?

**A:** In 1995, the San Francisco Bay Area Pollution Prevention Group, with funding from BADA 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 mobile 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.

**Q:** What information or data is there on these types of discharges?

**A:** Unfortunately, there is limited data on the quality and quantity of these discharges. BASMAA is actively gathering existing data and is working with cleaners, their customers, and agencies to generate more data. 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 mobile cleaning activities as a significant source.

**Q:** What best management practice (BMP) sources are available and acceptable?

**A:** There are basically two sources now. 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. It was developed by BASMAA and an advisory committee including representatives from CETA, mobile cleaners, and treatment plants. 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 red "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 mobile cleaner's training materials."

**Q:** How does a surface cleaner get recognition?

**A:** Workshops are being held at various locations in the Bay Area starting in late summer 1996. The first workshop in Hayward was very well attended with over 90 cleaners and suppliers becoming recognized. After this round of workshops, a workshop training kit will be made available to municipalities and wastewater treatment plants interested in offering the workshop at their discretion. Included in the kit will be all the materials necessary to conduct the workshop and confer recognition to attendees.

**Q:** How do I find "Recognized Mobile Cleaners?"

**A:** BASMAA keeps and updates 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 jobs.

If you have further questions about this program, please call either Geoff Brosseau (BASMAA) at 510-286-0615 or Tom Mumley (RWQCB) at 510-286-0962.